



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

OCT 15 2010

US EPA RECORDS CENTER REGION 5



1006590

Mr. Chris Korleski
Ohio Environmental Protection Agency
Lazarus Government Center
50 West Town Street
Suite 700
Columbus, OH 43215

PPPO-03-1045042-11

Dear Mr. Korleski:

**RESOURCE CONSERVATION AND RECOVERY ACT PERMIT # OH7890008983,
PORTSMOUTH GASEOUS DIFFUSION SITE; MODIFICATION/CO-OPERATOR
TRANSFER: LATA/PARALLAX PORTSMOUTH, LLC TO FLUOR-B&W
PORTSMOUTH, LLC**

Reference: Letter from M. Ashby to R. Bell "Resource Conservation and Recovery Act (RCRA) Part B Permit #OH7890008983, Portsmouth Gaseous Diffusion Plant; Modification / Co-operator Transfer: LATA/Parallax Portsmouth LLC to Fluor-B&W Portsmouth LLC", dated October 15, 2010

The U.S. Department of Energy (DOE) requests that the Ohio Environmental Protection Agency approve a modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. Specifically, the request is to change the co-operator of the facility from LATA/Parallax Portsmouth, LLC (LPP) to Fluor-B&W Portsmouth, LLC (FBP). DOE will remain the owner and a co-operator of the facility.

The following items are submitted in support of this request:

- Strike-through pages that identify the proposed changes to the current permit
- Clean-copy replacement pages with the proposed changes for the current permit
- Strike-through pages that identify the proposed changes to the permit renewal application
- Clean-copy replacement pages with the proposed changes for the permit renewal application
- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D) (included as Section N in the clean-copy replacement pages)
- An agreement between LPP and FBP for the change in co-operator responsibilities.
- FBP compliance history.

Thank you for your attention to this matter. If you have any questions or need additional information, please contact Rich Meehan of my staff at (740) 897-3876.

Sincerely,



William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures:

1. Strike-through pages that identify the proposed changes to the current permit
2. Clean-copy replacement pages with the proposed changes for the current permit
3. Strike-through pages that identify the proposed changes to the permit renewal application
4. Clean-copy replacement pages with the proposed changes for the permit renewal application
5. A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D) (included as Section N in the clean-copy replacement pages)
6. An agreement between LPP and FBP for the change in co-operator responsibilities.
7. FBP compliance history.

cc w/ enclosures:

melody.stewart@epa.state.oh.us
james.carroll@epa.state.oh.us
scott.bergreen@epa.state.oh.us
Thomas.lee@inl.gov
Joel.bradburne@lex.doe.gov
Kristi.wiehle@lex.doe.gov
lbauer@lppports.com
RCRA Branch Program Section, U.S. EPA Region 5
Administrative Records

**Strike-Through Pages to Identify Changes
Current Permit**

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SECTION B FACILITY DESCRIPTION

B-1 General Description [3745-50-44(A)(1)]

This facility description section is intended to provide the permit application reviewer with a general overview of the Portsmouth Gaseous Diffusion Plant (PORTS) facility and the activities conducted at the site by the U. S. Department of Energy (DOE). The RCRA Part B Hazardous Waste Permit Application that comprises this document is for a final permit for container storage unit X-326 and is divided into Sections A through N. Documents and information required to support a particular section are provided within that section. Section A of this permit comprises the requirements of the "Part A" permit application for the X-326 hazardous waste storage unit at PORTS.

PORTS is owned by DOE and is contractor managed by ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. For the purposes of this permit application, DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC are Co-Operators of the X-326 Hazardous Waste Storage Units. Currently, DOE activities at PORTS employ approximately 200 people. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

U.S. Department of Energy
Portsmouth/Paducah Project Office
Attention: William E. Murphie, Manager
1017 Majestic Drive, Suite 200
Lexington, KY 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Melda J. Rafferty
P.O. Box 700
Piketon, OH 45661

SUBMISSION DATE:

The U.S. EPA identification number for DOE Operations at PORTS is:

OH7890008983

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a 3,714-acre federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio, as shown in Figure B-1. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio. Major site facilities are shown in Figure B-2. Figures B-3 through B-6 each present one-quarter of the site in greater detail with topographic contours.

PORTS began operating in 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment is accomplished by the gaseous diffusion process.

Beginning in 1993, all uranium enrichment operations at PORTS were conducted by the United States Enrichment Corporation, formed as a government-owned corporation by the Energy Policy Act of 1992, that became private in July 1998. In May 2001, USDOE placed the gaseous diffusion plant in cold standby, through a contract with USEC, to maintain the facilities for possible restart within 18–24 months in the event of a significant disruption in the nation's supply of enriched uranium. USDOE continued the plant in cold standby through September 2005 and has since transitioned the gaseous diffusion plant into cold shutdown in preparation for future decontamination and decommissioning of the facilities. USEC continues to lease the facilities under the Nuclear Regulatory authorization. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, and operation of nonleased facilities.

As a result of historical and current operations at the site a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes. Table B-1 shows the status of active hazardous waste management units at PORTS and includes the hazardous waste container storage unit X-326. A description of X-326 are provided in the paragraphs that follow. Table B-2 provides a listing of solid waste management units at PORTS.

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Section C

Waste Characteristics

C-1 Chemical and Physical Analysis [3745-50-44(A)(2), 3745-54-13(A)]

The Portsmouth Gaseous Diffusion Plant (PORTS) is a large, industrial, chemical processing complex that generates a variety of wastes. The Department of Energy is responsible for environmental restoration and waste management at the site. The gaseous diffusion process buildings and related facilities were leased to United States Enrichment Corporation (USEC) on July 1, 1993. USEC is responsible for the waste generated as a result of the cold shutdown activities associated with the gaseous diffusion plant. The X-326 container storage unit is used to store waste generated by DOE from current environmental restoration and waste management activities and waste generated prior to the lease agreement with USEC. Some USEC-generated wastes are also stored in the container storage units. Limitations on the storage of USEC Land Disposal Restriction wastes are provided by a separate Director's Finding and Orders for USEC. DOE and LATAParallax FLUOR-B&W Portsmouth LLC are not responsible for compliance with the USEC Order.

Waste managed by DOE includes a variety of closure and remediation wastes, such as excavated soils, wastewater treatment sludge, neat trichloroethylene, and "legacy" waste generated from the gaseous diffusion plant operations prior to the lease agreement with USEC. The gaseous diffusion process, produced enriched uranium using conventional mechanical equipment.

All of the hazardous wastes generated at PORTS by DOE are currently assumed to include radioactive material from DOE operations and must be stored onsite as mixed (hazardous and radioactive) waste. Wastes determined to be mixed wastes are managed at the X-326 container storage units or shipped to another DOE facility until approved treatment and disposal methods for mixed wastes are available. If sufficient documentation is developed to demonstrate that a waste contains no added radioactive constituents, the waste will be shipped offsite to a commercial treatment, storage, disposal, or recycling facility.

The largest volume of wastes generated by DOE are from environmental restoration activities at the site. The hazardous wastes generated by diffusion-related activities consist of oils, solvents, and other cleaning agents produced in decontamination and maintenance activities. These hazardous wastes are predominantly characterized on the basis of process knowledge. PORTS assumes that suspected contaminants are present until further investigation and/or analysis proves the constituents are not present or are present at concentrations below characteristic

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regulatory thresholds. All hazardous wastes are stored in the container storage units located within the X-326. A detailed description of these units is presented in Section D.

The following text and Table C-1 provide a brief description of each hazardous waste stream stored at PORTS presented by activity or area of generation. These descriptions include the following information for each waste stream: the generating process; the history of the process (where relevant); the hazardous characteristic or nature of each waste stream; and the basis for characterization. The constituency and hazardous waste code designations provided represent a survey of the general nature of each waste stream. Actual constituency and waste codes will not necessarily include all those provided in the following discussion. These waste streams and sources include certain historically generated wastes remaining in storage because of a lack of offsite treatment or disposal methods. In addition, waste streams and sources identified in this section include wastes/sources that are currently anticipated from planned activities. Proper storage of all wastes is ensured through the use of the waste stream review/analysis procedures provided in Section C-2.

The list of waste streams presented in Table C-1 includes a brief explanation of the basis for characterization for each waste stream. PORTS most commonly uses its understanding of generating processes, manufacturer's knowledge and materials used to characterize its wastes, and Table C-1 reflects this characterization. PORTS often uses Material Safety Data Sheets (MSDSs) in support of its waste characterizations based on process knowledge. PORTS has conducted analysis for several wastes to confirm characterization. Table C-1 indicates whether or not analysis exists, and example analytical reports are presented in Appendix C-1. In addition, representative MSDSs used to support waste characterization are presented in Appendix C-2. All data supporting waste characterizations are maintained in the facility operating record for a minimum of 3 years.

Waste streams have been assigned numbers to facilitate cross-referencing between the waste stream narrative, Table C-1, and the support documents in Appendix C-1. Waste stream numbers begin with number or letter designations representing the building or activity that is the primary source of the wastes. Letter precursors of PORTS building numbers such as "X" have been omitted to simplify the numbering system. Following the characters identifying the source is a number representing each individual waste stream from a generating source. For example, waste stream number 100-1 represents the first waste stream discussed from the X-100 Administration Building. In the case of waste streams that are common across the plant site, the letters "SW" are used as the designated source of the wastes, representing wastes that are generated site-wide. Waste stream numbers have relevance only in this permit application and do not reflect any

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numbers that are or will be assigned by DOE and/or ~~LATA/Parallax~~ FLUOR-B&W Portsmouth Company LLC in managing the X-326 container storage unit.

Site Wide (SW)

Many waste streams generated at PORTS are common to various locations around the site. Rather than discuss these wastes in the context of each building or generating source, the following text describes them as they occur site-wide.

Laboratory Off-Specification Chemicals

Due to the nature of the laboratory activities conducted in various locations at PORTS, a large number of small containers of chemicals are required for testing and formulation. These chemicals are routinely depleted, but occasionally they must be considered waste due to process changes or to chemicals being stocked past their shelf lives. Laboratory off-specification chemicals (SW-1) are now classified as with metals (SW-1A) or without metals (SW-1B), when possible, and are characterized as hazardous wastes through process knowledge (as shown on Table C-1) according to the nature of the constituents identified on the containers or MSDSs.

Rags, Gloves, Wipes, Absorbent Material, etc.

Operations at PORTS involve the use of rags, gloves, wipes, absorbent materials, etc. in support of processes and activities in every building. These materials (SW-2) are primarily used in general cleaning, spill cleanup, material handling, and various maintenance activities as provided in Table C-1. Such materials are characterized as hazardous wastes through process knowledge and MSDS information on the basis of their usage and constituency. In addition, analysis of these wastes from several sources has found the wastes may contain chromium (D007), lead (D008), and/or benzene (D018).

Floor Sweepings

Floor Sweepings (SW-3) are generated by housekeeping activities in all PORTS process-related buildings. Based on analytical results, these sweepings are characterized as hazardous wastes because they contain cadmium (D006), chromium (D007), lead (D008), and/or selenium (D010). Metals found in floor sweepings are from maintenance or machining activities in the cascade process buildings.

SUBMISSION DATE:**Batteries**

Operations at PORTS involve the use of batteries in a variety of applications. Batteries managed as hazardous waste include lithium batteries (SW-4A), mercury batteries (SW-4B), spent and/or broken lead-acid batteries (SW-4C), and nickel-cadmium batteries (SW-4D). These waste batteries are characterized as D003, D007; D009; D002, D008; and D006 hazardous wastes, respectively, due to the presence of acid and chromium; mercury; acid and lead; or cadmium, as identified in MSDS for the batteries. Waste Stream SW-4 is maintained for historical battery waste that are mixed battery types.

Light Bulbs

Spent fluorescent bulbs (SW-5A), mercury-vapor bulbs (SW-5B), and sodium-vapor and other incandescent light bulbs (SW-5C) are characterized as hazardous wastes at PORTS due to the presence of mercury (D009) and/or lead (D008). Waste stream SW-5 is maintained for spent light bulbs that are not releasable due to radiological concerns. Metallic constituents in the light bulbs were identified by the bulb manufacturers. Available documentation supporting the hazardous waste characterization of waste bulbs is provided in Appendix C-1.

Antifreeze

During routine and preventative maintenance operations of facilities and machinery, quantities of waste antifreeze solutions are generated. Waste antifreeze (SW-6) is characterized as hazardous waste as a result of analytical data, which indicates the presence of selenium (D010).

Gas Cylinders

Spent commercial compressed-gas cylinders (SW-7) are generated at PORTS. A cylinder of hydrogen cyanide (P063) became off-specification when instruments that used hydrogen cyanide in their calibration process were replaced with instruments that did not. Other spent off-specification cylinder contained gases, such as chlorine trifluoride (D003) or acetylene (D001), are also anticipated to be generated as a result of process changes.

Aerosol Cans

PORTS uses aerosol cans containing various paints, cleaning solutions, oils, and pesticides in numerous applications throughout the plant. In general, these products are depleted, but occasionally are damaged or determined to contain dated materials and must be managed as wastes. Waste aerosol cans (SW-8) containing product are characterized as hazardous waste

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SECTION G-RCRA HAZARDOUS WASTE CONTINGENCY PLAN

[OAC 3745-50-44 (A)(7), 3745-54-50 through 56]

Overview and Purpose of Plan

This Contingency Plan describes the actions facility personnel will take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents to air, soil, or surface water. To fulfill this purpose, the plan will be implemented immediately whenever one or more of these occurrences could threaten human health or the environment.

This document, as Section G of the Portsmouth Gaseous Diffusion Plant (PORTS) Part B Permit Application, is being provided as a stand-alone document which amends the facility's emergency plan (Portsmouth Emergency Plan) as allowed for in OAC 3745-54-52 (b) and 40 CFR 264.52 (B). While the Portsmouth Emergency Plan integrates the plant's planning processes into a single document designed to mitigate the consequences of an emergency, this Contingency Plan stands alone for response to hazardous waste incidents.

This Hazardous Waste Contingency Plan contains the following elements:

- Designation and responsibilities of personnel who are to act as emergency coordinators,
- Implementation procedures for instructions on how and when the plan will be followed,
- Descriptions of both plant internal and external alarms and notification systems,
- Assessment methods and control actions should an emergency occur,
- Location, description and capabilities of emergency equipment at the facility,
- Agreements with USEC and with local authorities and medical centers, for providing emergency management and fire protection,
- Details of evacuation plans, and
- Record keeping and incident reports

Philosophy

At PORTS, the shared philosophy on emergencies is to prepare and maintain emergency plans dedicated to principles of personnel safety, environmental protection and safe equipment operation. Consequently, the response measures provided within this plan are designed to provide maximum protection for both onsite and offsite personnel, limit damage to facilities and equipment, limit adverse impacts on the environment and minimize impacts on site operations and security. The following PORTS philosophy indicates our commitment to personnel safety and the protection of the environment.

"The emergency philosophy of the Portsmouth Gaseous Diffusion Plant (PORTS) is to provide and maintain emergency plans that are dedicated to the following principles; in order, personal safety, environmental protection, and safe equipment operation." Contamination control issues and environmental protection concerns are to be addressed by emergency responders following the identification, recovery and condition assessment/treatment of ill or injured personnel.

This policy shall be applied and enforced comprehensively; however, provision must be made for deviations during emergency operations -- thus allowing the Emergency Coordinator to be in a position to make decisions based upon circumstances found at the time of an emergency.

Copies of Contingency Plan [OAC 3745-54-53]

Although not listed on the Part B Permit Application checklist, this section is required by the referenced regulations. A copy of the Contingency Plan and all revisions are provided to all applicable departments at PORTS. These include: custodians of hazardous waste storage units, the United States Enrichment Corporation (USEC) Emergency Preparedness Department, the USEC Fire Department, the USEC Police Department and the USEC Plant Shift Superintendent's office.

USEC, as part of an agreement to provide emergency management and fire protection service, obtains Letters of Agreement (LOAs) with offsite emergency planning and/or response organizations that have agreed to assist in the event of an emergency at

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PORTS. The Department of Energy (DOE)/~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC provides copies of the RCRA contingency plan to these organization as well as other interested stakeholders. This combined distribution list includes the following:

Adams County

Peebles Fire Department

Scioto County

Southern Ohio Medical Center

Post 73, Ohio State Highway Patrol

Scioto County Sheriff

Scioto County Local Emergency Planning Committee

Valley Local Schools

Scioto County Emergency Mgmt. Agency

Pike County

Pike Community Hospital

Pike County Sheriff

Pike County Emerg. Medical Service (6)

Scioto Township Volunteer Fire Dept

Beaver Volunteer Fire Department

Piketon/Seal Township Vol Fire Dept

Elm Grove Volunteer Fire Department

Stockdale Volunteer Fire Department

Waverly City Schools

USEC

Word Alive Fellowship

Pike County Fire Fighters Association

Pike County Local Emerg. Plng. Com.

Ohio Division of Forestry - Pike State Forest

Waverly Fire Department

Benton Township Volunteer Fire Department

Jackson Township Volunteer Fire Dept

Camp Creek Township Fire Department

Pebble Township Vol. Fire Department

Pike County Schools

Brush Creek Township Volunteer Fire Dept.

Franklin Township Volunteer Fire Department

Ross County

Adena Regional Medical Center Hospital

Others

Ohio Environmental Protection Agency (3)

United States Environmental Protection Agency

United States Department of Energy

Ohio Emergency Management Agency (OEMA)

Amendment of Contingency Plan [OAC 3745-54-54]

When the Contingency Plan is revised, PORTS provides documentation to U.S. Department of Energy (DOE), and regulatory agencies, and all departments and organizations currently on the above plan distribution list. The correspondence for distribution of a revised Contingency Plan includes an offer to familiarize the receiving organization with the changes in the plan.

G-1 General Information [OAC 3745-54-52]

The container storage units at PORTS are owned by DOE and are co-operated by DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 US 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

Department of Energy
William E. Murphie, Manager
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

SUBMISSION DATE:

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Melda J. Rafferty
P.O. Box 700
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC from USEC through a service agreement incorporated into the lease.

Location and Site Plan

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on 3,714.01 federally-owned acres. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product requires the use of numerous hazardous chemicals.

Employment at this facility is approximately 1750-2200.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

Planning Area

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents. This area is the two-mile immediate notification area (INA), within a two-mile radius of the center of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Alert System Radio Station Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

No schools are located within the immediate notification area. However, county school buses frequently travel all roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

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Land Use

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

Transportation Routes

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

Hazardous Waste Storage

X-326 Container Storage Unit

The X-326 Storage Unit (See Figure G-1) is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are six areas of the building, totaling approximately 31,888 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The X-326 Storage Unit is intended for the storage of high assay uranium-bearing hazardous and/or polychlorinated biphenyl wastes until further processing for uranium recovery or treatment through a permitted process is obtained. The wastes will include aqueous laboratory solutions, spent laboratory solvents and decontamination solutions from other buildings on plantsite. All containers will be constructed to Department of Transportation (DOT) specifications where available. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes.

The X-326 Storage Unit was designed and intended for the storage of high assay uranium bearing wastes until further processing for uranium recovery or treatment through a permitted process, such as a National Pollutant Discharge Elimination System-permitted discharge. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes. The wastes that may be stored in the X-326 Storage Unit include aqueous laboratory solutions, spent laboratory solvents, and decontamination solutions from several other buildings on the plantsite.

The waste that may be stored in the X-326 RCRA unit are the following: product and process waste designated as RCRA types F, P, and U, RCRA characteristic wastes, "mixed wastes" (both radioactive and hazardous wastes) and combinations of the above wastes. The majority of the wastes stored in the X-326 building are from environmental restoration activities and non-halogenated solvents and/or radioactive wastes from laboratories, decontamination solutions, and a variety of plant processes and clean-up operations. The remainder of the wastes are from a variety of diffusion process activities and are primarily toxic due to metal and solvent constituents.

The wastes are stored in a variety of containers, but are usually stored in DOT approved 55-gallon drums or 5-inch diameter/10-liter polyethylene bottles. Other containers as listed in Table D-2 of Section D of this application may also be used. The containers are stored on steel supports or are placed into support sleeves which are raised above the floor to prevent contact with potentially inadvertent standing liquid introduced into the area.

The X-326 Storage Unit is located in the south end on the first floor of the X-326 Process Building. Figure D-1 shows the floor plan for the X-326 Storage Unit. The X-326 Building is totally enclosed with a built-up roof, transite walls and concrete floors. Heating and cooling is provided as needed in the RCRA-permitted storage areas. The area around the building is sloped to direct run-on and run-off water to the PORTS storm sewer system.

Approximately 38,105 square feet of the X-326 is designated as storage space and will be used as required until final-closure is initiated.

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Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is ~~Darl Anderson~~ BOB NICHOLS. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA/Parallax FLUOR-B&W Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

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5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.

6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
 - C. Use of water or water and chemical fire suppressant could result in contaminated runoff.
2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
 - B. The spill could cause the release of toxic liquids or fumes.
 - C. The spill can be contained onsite, but the potential exists for groundwater contamination.
 - D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health, or the environment, he will report his findings as follows:

1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
3. To Ohio Emergency Response Team at 800/282-9378.

SUBMISSION DATE:

G-4 Emergency Response Procedures [OAC 3745-54-52 (A)]

The PORTS USEC Emergency Response Organization is prepared to respond by agreement to emergencies involving DOE facilities or requiring DOE assistance. The Emergency Response Organization is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers, public health and safety, and the environment.

The Emergency Response Organization is staffed with trained personnel who are required to participate in formal training, drills and exercises and respond if notified of an incident. The incident type and severity dictate the level of Emergency Response Organization activation.

The Emergency Response Organization has the following specific functions and responsibilities depending on the incident and level of response needed to mitigate the problem: event categorization, determination of emergency class, notification, provision of protective action recommendations, management and decision making, control of onsite emergency activities, consequence assessment, protective actions, medical support, public information, activation and coordination of onsite response resources, security, communications, administrative support and coordination and liaison with offsite support and response organizations.

Field Response

The Plant Shift Superintendent is delegated the responsibility by PORTS Environmental Management & Enrichment Facilities Site Manager to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The Incident Command System (ICS) is used by PORTS response for managing an incident at the scene. The Incident Command System provides a standard system for responding to all types of incidents. The two major functions of the Incident Command System are safety and efficiency. The system consists of personnel, facilities, equipment, communications and procedures operating within an organized structure to accomplish control of the incident.

When the Plant Shift Superintendent responds to the incident scene and takes charge, the Plant Shift Superintendent becomes the Incident Commander. The Incident Commander establishes a command post at a safe distance away from the incident scene in an upwind direction. All requested field response units report to the command post and receive directions from the Incident Commander for response actions.

All emergency personnel should be provided with as much information as possible, concerning the nature and hazards of the incident they are responding to. This information should include wind direction and speed, possible location of the Command Post, and any areas to avoid. Any changes in the conditions at the incident scene must be passed quickly to all responders.

The Plant Shift Superintendent/Incident Commander is located in the X-300 Plant Control Facility (PCF) which serves as the 24-hour point of contact for all emergency notifications. The Plant Shift Superintendent/Incident Commander:

- Provides continuous site-wide emergency direction;
- Directs the effort to respond to an incident;
- Assesses the incident and makes initial categorization/classification;
- Alerts and mobilizes sufficient response forces, including technical assistance, to respond to the requirements of the emergency;
- Directs plant or facility shutdown if necessary in accordance with existing plans and procedures; and
- Ensures communications with the Emergency Operations Center (EOC), when appropriate.
- Emergency responders who routinely report to the Command Post include:
 - Plant Shift Superintendent/Incident Commander
 - Response Safety Officer
 - Police Force
 - Local Emergency Director
 - Fire Department

SUBMISSION DATE:

The following organizations are called on by the Incident Commander, when necessary:

- Environmental Compliance
- Industrial Hygiene
- Nuclear Safety
- Maintenance
- Waste Management
- Health Physics
- Medical
- Utilities
- Facility Operations

In addition, offsite Emergency Response Organizations are available to assist the onsite Emergency Response Organization when needed.

Emergency Operations Center

When the Emergency Operations Center becomes operational, overall command and control of the PORTS Site Emergency Response is transferred to the Crisis Manager, allowing the Incident Commander to focus on conditions and mitigation at the emergency scene. The Emergency Operations Center is located in the X-1020 Building and becomes the primary facility for coordinating onsite response and mitigation and offsite interface activities. The Emergency Operations Center is composed of an emergency information center where members of Senior Management and advisors operate, coordinate activities and communicate with onsite and offsite personnel; a Crisis Management Room (CMR) where the Crisis Management Team (CMT) is stationed to follow events and direct actions; a Technical Support Room (TSR) where the TSR Coordinator advises and directs the activities of the technical support group; a radio room where personnel monitor and transmit information; a computer room which houses the information management system; and an area where security personnel coordinate the activities of the protective force. The emergency line of executive succession for the Crisis Manager's position is shown in the next section.

The Plant Shift Superintendent will activate the Emergency Operations Center in the event of any emergency classification: alert or site area emergency. The Emergency Operations Center may be activated at any classification level or when deemed necessary.

The Plant Shift Superintendent or alternate or the Enrichment Plant Manager or alternate are authorized to activate the Emergency Operations Center. Alternate Emergency Operations Centers include the X-300 Plant Control Facility and the Mobile Communications Vehicle. Emergency Operations Center service is by an agreement between USEC and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC.

Emergency Line of Executive Succession

In the event of a significant emergency at PORTS, emergency executive succession of command shall be in the order listed below. If none of the management listed are available in the plant, the Plant Shift Superintendent shall assume command as well as fulfill his responsibilities as Incident Commander. The Plant Shift Superintendent will be relieved of the executive command duties by the first person to arrive as identified from the list below. PORTS does not consider those named on the list of "Emergency Line of Executive Succession" to be Emergency Coordinators. The Plant Shift Superintendent/Incident Commander continues his obligations for oversight of the emergency response.

- General Manager
- Plant Manager
- Other personnel as designated by the General Manager and trained and qualified as Crisis Manager

G-4A Notification [OAC 3745-54-56 (A)]

This section describes the methods used for notifying PORTS Emergency Response Forces, other plant personnel and appropriate Local, State and Federal Agencies in time of an emergency.

Notification refers to required communication within mandated time frames and according to a predetermined sequence, of general information on the nature and severity of an emergency event. Notification is different from reporting because it must occur without delay for the purpose of alerting or activating, rather than informing. Notification requirements vary according to reported event level and may continue to change depending upon preliminary classification, ongoing assessments, full classification and any changes in classification.

SUBMISSION DATE:

The Plant Shift Superintendent is responsible for categorizing an event as an emergency and assigning an emergency classification. The Plant Shift Superintendent is responsible for initial notifications in accordance with Federal and State Regulations. Subsequent notifications may be the responsibility of the Plant Shift Superintendent in his role as Incident Commander or the Crisis Manager after the PORTS Emergency Operations Center becomes operational.

In any event, a prearranged format is used to ensure that the content of the notification message(s) includes the emergency classification, whether a hazardous substance and toxic chemical, hazardous waste or hazardous waste constituent, mixed waste or mixed waste constituent release is occurring or expected and identification of the response and/or protective actions taken or recommended.

Figure G-3, Emergency Notification Form (or a similar form that meets RCRA regulatory requirements), is used for notification of an emergency. Predesignated offsite agencies are notified within 15 minutes of classification of an emergency.

Primary and Alternate Systems

Primary and alternate systems are in place for notifications to the Emergency Response Organization and offsite agencies. Periodic testing is conducted according to site Emergency Preparedness Implementing Procedures.

Notification of Onsite Personnel

Members of the PORTS Emergency Response Organization are notified of a need to respond to an emergency by a variety of ways including automatic alarms, pagers, radios, public address system and telephones.

Plant personnel not assigned to the Emergency Response Organization receive notification of an onsite emergency condition by one of eight different alarms followed by announcements over the plant's public address system. An example of plant alarms includes a continuous sounding alarm that means for plant personnel to evacuate a building and go to their assigned assembly area. To account for all plant personnel, the accountability alarm consists of seven (7) short blasts repeated three (3) times.

Notification of State and County Governments

Telephone notification is made to the Pike County 24-hour Contact Point and the Ohio Emergency Management Agency and the Ohio Environmental Protection Agency. When a site area emergency is declared, the notification to the county's 24-hour Contact Point will include a reminder that at upon the site area emergency classification, the public warning system will be activated to notify the residents in the two-mile immediate notification area (INA).

The public warning system consists of five outdoor warning sirens, tone alert radio receivers, and the Emergency Broadcast System (EBS).

Notification of DOE

Notification to DOE Headquarters, the Portsmouth/Paducah Project Office, and the DOE Oak Ridge Field Office is made by telephone or verbal or facsimile messages.

Notification of LATA/Parallax FLUOR-B&W Portsmouth LLC Corporate Personnel

Corporate personnel are notified of an emergency at PORTS by telephone or verbal or facsimile messages.

G-4B Identification of Hazardous Substances and Toxic Chemicals [OAC 3745-54-56(B)]

Upon arrival at the scene of an emergency, the Plant Shift Superintendent/Incident Commander will immediately make an assessment of the character, source, amount and extent of the release that has occurred. Resources such as storm sewer and water line drawings used to identify potential flow/contamination paths are shown in Figure G-4.

In the event of a release, fire, or explosion, the identification of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents in the X-326 Waste Storage Units would be accomplished by direct observation of the leaking container or by the container inventory system maintained by the Waste Management (WM) Division.

SUBMISSION DATE:

This system maintains an accountability for each container. The record for a container includes the generator data, analytical results and location in the storage unit. Because the wastes are segregated by compatibility and type, the location of the emergency may identify the material. The accountability systems are updated as frequently as necessary (often daily) to maintain an accurate container inventory.

The container inventory system is computerized with backup of data in a filing system. The data for any given container can be accessed from a computer terminal within five (5) minutes. Communications with Waste Management would be by telephone or radio. Should power be interrupted, and the computer system become inoperable, the paper back-up filing system would be used.

By the location of the incident, Waste Management personnel could locate the proper files which will reveal the contents of the containers involved. A third method of identification is the collection and analysis of samples. All sampling of air, soil, water, or pooled wastes will be performed in accordance with established standards, such as SW-846, ASTM, or others. All analyses will be performed in accordance with regulatory agency approved methods, such as SW-846 or in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.

G-4C Hazard Assessment [OAC 3745-54-56 (C)]

In the event of an emergency, the Plant Shift Superintendent/Incident Commander has at his disposal any and all personnel and resources to assist and/or advise in the assessment of the situation and its amelioration. The Plant Shift Superintendent/Incident Commander will base the assessment on all available information including process knowledge, material safety data sheets, models of air, surface water or groundwater flow patterns, and specific health based environmental criteria or limits which may be exceeded. Environmental surveillance air sample data, at a minimum, will be collected and evaluated. By utilization of this existing database and trained personnel, the Plant Shift Superintendent/Incident Commander will be able to assess both the direct and indirect effects potentially caused by the emergency. Personnel routinely available to the Plant Shift Superintendent/Incident Commander for advice and consultation include those with skills and experience in chemistry, biology, engineering, industrial hygiene, safety, regulatory compliance, process engineering and operations, health physics, medicine and other sciences. Key personnel are on call to respond to the Plant Shift Superintendent/Incident Commander at any time. If the appropriate personnel are not promptly available, the Plant Shift Superintendent/Incident Commander has been granted the authority by plant management to act on the available information and to utilize his best judgment. Existing plant emergency procedures, methods, and policies, with which the Plant Shift Superintendent/Incident Commander and the Shift Emergency Response Organization are routinely trained and exercised, provide the Plant Shift Superintendent/Incident Commander with the assistance to exercise his best judgement with confidence.

If the assessment of the emergency situation indicates that evacuation of plant personnel is required, the Plant Shift Superintendent/Incident Commander will notify the necessary personnel and area or building evacuation will be initiated. If it is determined that offsite populations must be evacuated, the Plant Shift Superintendent/Incident Commander will follow the guidelines as set forth in this contingency plan and local community response plans.

This Section also describes the protective actions developed to limit exposure of plant personnel and the public during an emergency at PORTS.

Protective Actions for Onsite Personnel

Protective actions for onsite personnel (including visitors and contractor personnel) includes alerting, assembly and accountability, evacuation, monitoring and decontamination.

Plans have been developed for protection and accountability of onsite personnel within 45 minutes (not to exceed 60), including identification of special conditions, locations of assembly areas and provisions for onsite sheltering-in-place. Upon notification of an emergency by the Plant Shift Superintendent, emergency response forces proceed to their response locations. Plant personnel not assigned an emergency response position and contractors proceed to a designated monitoring station or assembly point. Visitors remain with their escorts and are accounted for.

Evacuation of personnel is ordered by the Plant Shift Superintendent or Crisis Manager whenever it is determined that a threat to the safety of plant personnel exists. Directions on the specific evacuation routes are provided. The appropriate decision of an assembly point and evacuation route is determined based upon plant conditions, wind direction and weather.

SUBMISSION DATE:

4. Following abatement of the emergency, all impounded runoff will be characterized. Sampling and analysis, if necessary, will be performed in accordance with agency-approved methods such as SW-846, or, in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.
5. If the runoff is determined to be hazardous, the runoff will be treated or disposed of in accordance with applicable RCRA regulations.
6. Following removal of the water from the containment areas, a soil sampling program will be initiated to determine if the soil has become contaminated.

G-4G Incompatible Wastes [OAC 3745-54-56(H)(1)]

Determinations of chemical characteristics and incompatibilities by the Plant Shift Superintendent/Incident Commander can be done with visual inspections, field sampling and by knowledge of the waste origination. The analytical procedures of the waste analysis plan and the waste management and segregation procedures of the storage units and their procedures to prevent hazards are also applicable to ensuring that there will be no incompatibility problems.

G-4H Post Emergency Equipment Maintenance [OAC 3745-54-56(H)(2) and (I)]

Following its use in an emergency or routine maintenance situation, all equipment is cleaned/decontaminated of hazardous substance and toxic chemical or residual excavated materials prior to being placed into storage for reuse as necessary. The purpose of the cleaning is twofold: 1) to maintain the equipment in usable condition; and 2) to prevent the spread of and/or unnecessary exposure to hazardous and/or radioactive materials.

Expendable supplies such as disposable personal protective equipment are inventoried and replaced as required as part of the decontamination activities. These decontamination activities are performed after the generated residues are containerized and sampled (as necessary) to ensure only compatible materials are stored together. The completion of the site cleanup is to include the maintenance of equipment and the replenishment of supplies, which will then be reported to the Administrator of Environmental Protection Agency (EPA) Region V, the Director of Ohio EPA and any other applicable state or local agency prior to the resumption of normal operations.

G-4I Container Spills and Leakage [OAC 3745-54-52(A)(E), 3745-55-71]

Spill control equipment shall be located and available in the hazardous waste storage units at all times. Waste Management operating procedures provide detailed steps for handling and replacing leaking containers.

The general procedure that is followed is:

1. The spill or leak is contained using an inert absorbent if it can be safely done by personnel detecting the spill or leak. Once the spill or leak is safely contained, clean-up activities shall begin immediately.
2. Chemical Operations personnel, Environmental Compliance personnel, the Plant Shift Superintendent/ Incident Commander, and, if necessary, emergency response personnel are notified to provide safe clean-up guidelines and equipment.
3. The contents of the drum will be transferred to a container as specified in Table D-1 or the drum and contents will be placed in an overpack drum as stated in the procedure.

Environmental Compliance will evaluate the occurrence against current regulations and determine the reporting requirements and, if necessary, draft appropriate notifications.

After the emergency has been abated, the transfer of additional hazardous wastes into the storage area will be discontinued until the area is properly cleaned. There is sufficient space in other onsite storage areas to accommodate this material for several weeks.

SUBMISSION DATE:

G-4J Tank Spills and Leakage [OAC 3745-55-93]

PORTS is not seeking a permit for any tanks; therefore, this section does not apply.

G-4K Surface Impoundment Spills and Leakage [OAC 3745-56-27]

PORTS is not seeking a permit for any surface impoundments; therefore, this section does not apply.

G-5 Emergency Equipment [OAC 3745-54-52(E)]

Fire Extinguishing Equipment

The closest fire department is operated by USEC. This fire department maintains a full time dedicated fire department, which includes three pumpers: 1 - with a 1250 gallons per minute (gpm) pump and 500 gallon booster tank; 1 - with a 1250 gpm pump and a 500 gallon booster tank and 1 - with a 1000 gpm pump and a 500 gallon booster tank; 1 - mini-pumper with 300 gpm pump and a 300 gallon booster tank, and a 4-wheel drive heavy rescue vehicle, and two ambulances. The department has a truck; for carrying all types of miscellaneous emergency equipment. In addition, the department operates several pickup trucks. Each vehicle and its complement of equipment is checked at the start of each shift and a complete inventory is taken each week. This equipment and staff are housed in a modern, eight bay, brick building known as the X-1007 Fire Station. Included in the fire station is a modern, computerized alarm room.

There are two separate firewater distribution systems at PORTS. The high-pressure fire water system services all sprinkler systems and the fire hydrants in the newer areas of the plant. It has a 4-hour fire flow of 16,000 gpm at 125 pounds per square inch (psi). The low-pressure system is also known as the sanitary water system and services the fire hydrants in the older area of the plant. It has a 4-hour fire flow of 5,000 gpm at 75 psi. Fire hydrant spacing on both systems is nominally 300 feet. Both hazardous waste storage units have building sprinkler systems on the high-pressure system. The fire hydrants in the area of X-326 are on the low-pressure system. The PORTS Fire Department is located in Building X-1007, about 1,000 feet from the storage unit.

Along with the fire protection systems at PORTS, the X-326 building has a set of portable fire extinguishers available. Each unit is inspected on a routine basis. NFPA Class A, B, C or combination extinguishers can be found in most areas and are generally located 75 feet apart or approximately one for each 1250 ft² of floor space per NFPA standards. These units are to be used for small fires (e.g. waste baskets, paper on desk) only, as general personnel are not trained to fight significant fires.

Emergency and Spill Control Equipment

The container storage units have an extensive array of emergency and spill control equipment available for routine and emergency use. All equipment is maintained on a preventative maintenance schedule as recommended by the manufacturer. The list of equipment is presented as Table G-2.

In addition to the emergency equipment, DOE/LATA/~~Parallax~~ FLUOR-B&W Portsmouth LLC has a wide variety of heavy equipment (lifting and earth moving) available for use, in an emergency, by agreement with USEC.

Personal Protective Equipment

PORTS maintains a wide variety of personal protective equipment including respiratory protection; protective clothing, including chemical-resistant encapsulating suits; and self-contained breathing apparatus. The types of respiratory protection available include organic vapor half-face, full-face and, fresh air respirators; and the aforementioned self-contained breathing apparatus. Protective clothing includes cloth coveralls, aprons, shoes, boots, various types of gloves and headgear. The chemical-resistant encapsulating suits are maintained by the USEC Fire Department Personnel who receive special training in the use, testing and inspection of such equipment.

SUBMISSION DATE:

Emergency response personal protective equipment consisting of both Level A and Level B Equipment is assigned to and is either carried on fire vehicles or is stored in the X-1007 Fire Station.

Level A Equipment consisting of positive-pressure self-contained breathing apparatus, full-encapsulating chemical resistant suits with built-in gloves, steel shank boots, a hard hat and extra gloves are carried on the fire department emergency truck. Extra positive-pressure self-contained breathing apparatus and extra air bottles are also stored on this vehicle.

Level B Equipment is worn by all responding firemen and consists of complete fire turnout gear and self-contained breathing apparatus. Additional positive-pressure self-contained breathing apparatus is available on all fire apparatus except the two ambulances. These responders normally wear white cotton gloves under their regular work gloves, and have available to them plastic booties to wear over their boots, if such protection is needed.

Tyvec coveralls, cotton gloves, skull caps, respiratory protection, plastic booties, and extra air bottles are also carried on the emergency truck. An additional supply of these items are stored in supply cabinets in the X-1007 Fire Station.

Once the situation has been stabilized by the immediate response of the fire department and the potential hazards of fire and explosion have been reduced to an acceptable level, cleanup is completed by the USEC Chemical Operations Department with the Fire Department on standby. The personal protective equipment of the chemical operators is normally Level D and occasionally Level C. The level of protection is determined by the Industrial Hygienist after determining the nature of the material spilled, taking and evaluating instrument readings for that material, and consulting with the Plant Shift Superintendent/Incident Commander, fire captain and safety personnel so that all potential hazards are considered.

Internal Communications and Alarm Systems

PORTS emergency communications and alarms are established in a variety of methods. The most familiar and easily usable is the telephone. The dialing of the emergency number (911) on any plant telephone will automatically connect the caller with the USEC Fire Department. The caller will be requested to describe the nature of the emergency and location and be told to remain, if possible, at the scene until emergency personnel arrive.

Another familiar alarm device is the fire alarm boxes located in virtually every building on plantsite. When tripped, the alarms will sound in the fire department. Personnel sounding the alarm should remain as close to the alarm box as is safely possible in order to guide emergency response personnel to the occurrence scene.

Other alarms include bells, whistles, and horns which sound in a variety of ways depending on the nature and extent of the emergency. For example, in the event of an emergency, a personnel accountability alarm may be sounded (seven rings on a bell, repeated three times) and/or, if an evacuation is necessary, a horn will sound with a continuous blast.

Emergency communications may also be accomplished by means of hand held two-way radios. A dedicated emergency frequency is assigned, and an alternate frequency may be utilized, if necessary. All personnel who may have use of a two-way radio are instructed as to its proper use.

External

The telephone is the primary means of external communication. Both hazardous waste storage units have telephones. The Plant Shift Superintendent, Fire Department and Police-Department have radio capability to monitor and communicate directly with the area emergency responders. PORTS also has facsimile and electronic information transfer capability to communicate with those who have compatible equipment.

First Aid and Medical Equipment

PORTS has a doctor and nurses who can administer the full range of first aid and stabilization techniques to injured or ill personnel. The PORTS Hospital has an emergency room, examination suites and 3 holding beds. It is staffed on day-shift Monday through Friday excluding holidays with a physician on day-shift. The Fire Department maintains two fully equipped ambulances and most fire department personnel are certified Emergency Medical Technicians or Paramedics. These services are available through an agreement with USEC.

SUBMISSION DATE:**Decontamination Equipment**

Emergency decontamination equipment for injured personnel and responder decontamination is carried on the plant emergency truck, ambulances, and fire apparatus. Additional equipment and neutralizing solutions are stored in the X-1007 Fire Station or the X-101 Hospital. This equipment generally consists of responder protective equipment, decontamination solutions, solution containment devices, and contaminated clothing storage bags.

Gross decontamination of responders is generally accomplished by using safety showers or sanitary showers in affected buildings, with decontamination solutions being stored in proper containers awaiting characterization or by decontamination with portable hoses and/or sprayers. Decontamination solutions can be collected in portable pools for proper characterization, treatment and disposal.

Heavy equipment may be decontaminated by use of water hoses, portable high pressure water or steam cleaners. Prior to this step, all gross contamination is brushed off of the affected surfaces, to limit the concentration in the decontamination solutions. Solutions and solids potentially contaminated with hazardous constituents are collected, sampled and properly disposed of following analytical data review.

G-6 Coordination Agreements [OAC 3745-54-37, 3745-54-52(C)]

An agreement with USEC provides the services of an onsite hospital, fire department, and police department. As the primary provider of emergency services to DOE/LATA/Parallax FLUOR-B&W Portsmouth LLC, USEC obtains and is responsible for updating mutual aid agreements with several surrounding communities for joint support for emergencies at PORTS or within the communities. Copies of the mutual aid agreements and other letters of understanding with the following agencies are attached.

Mutual Aid Agreement

Piketon-Seal Township Volunteer Fire Dept	Beaver Volunteer Fire Dept
Benton Township Volunteer Fire Dept	Pebble Township Volunteer Fire Dept
Camp Creek Township Volunteer Fire Dept	Stockdale Volunteer Fire Dept
Elm Grove Volunteer Fire Dept	Waverly Fire Dept
Jackson Township Volunteer Fire Dept	Scioto Township Volunteer Fire Dept
USEC Fire Dept	Brush Creek Volunteer Fire Dept
Peebles Fire Dept	Franklin Township Volunteer Fire Dept
Pike County Fire Fighters Association (fire departments listed are part of this association)	
Ohio Division of Forestry – Pike State Forest	
Pike County Sheriff's Department	

Hospitals (LOA)

Pike County Emergency Medical Service, Waverly, Ohio
Pike Community Hospital, Waverly, Ohio
Southern Ohio Medical Center, Portsmouth, Ohio
Adena Regional Medical Center, Chillicothe, Ohio

Schools (LOA)

Pike County Schools
Valley Local Schools
Waverly City Schools, Waverly, Ohio

The remoteness of the plant from local communities would delay their emergency personnel's response time to PORTS in the event of an emergency. Therefore, USEC will be the primary emergency authority.

The Site Emergency Plan for an emergency at PORTS includes participation of county emergency forces. The plan also provides site orientation tours and classroom training biennially. The PORTS initial responders are intimately familiar with the facility and will have assessed the hazards and support needs prior to the arrival of offsite aid. For these reasons, PORTS will

SUBMISSION DATE:

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Darl Anderson BOB NICHOLS	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

SUBMISSION DATE:

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.)

SUBMISSION DATE:

**ATTACHMENT M.1
1999 DIRECTOR'S FINAL FINDINGS AND ORDERS**

~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is not a party to the 1999 Director's Final Findings and Orders. With respect to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's obligation to perform work under the 1999 Director's Final Findings and Orders, this obligation arises from ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's contract with DOE. Consequently, any obligations under the 1999 Director's Final Findings and Orders that ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC may have through contract with DOE terminate when ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is no longer responsible under contract.

SUBMISSION DATE:

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SUBMISSION DATE:

**ATTACHMENT M.2
1989 CONSENT DECREE**

~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is not a party to the 1989 Consent Decree. With respect to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's obligation to perform work under the 1989 Consent Decree, this obligation arises from ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's contract with DOE. Consequently any obligations under the 1989 Consent Decree that ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is no longer responsible under contract.

SUBMISSION DATE:

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SUBMISSION DATE:

**SECTION N
CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy
Owner and Operator

Site Manager

Date Signed

LATA/~~Parallax~~ FLUOR-B&W Portsmouth LLC
Co-Operator

BY: _____

Project PROGRAM Manager

Date Signed

The Department of Energy has signed this application for the permitted facility as owner and operator and LATA/~~Parallax~~ FLUOR-B&W Portsmouth LLC has signed as co-operator. The Department has determined that dual signatures best reflect the actual apportionment of responsibility under which the Department's RCRA responsibilities are for policy, programmatic, funding and scheduling decisions, as well as general oversight; and, the contractor's RCRA responsibilities for day-to-day operations, (in accordance with general directions given by DOE as part of its general oversight responsibility), including but not limited to, the following responsibilities: waste analysis and handling, monitoring, record keeping, reporting, and contingency planning. For purposes of the certification required by OAC 3745-50-42(D), the DOE and LATA/~~Parallax~~ FLUOR-B&W Portsmouth LLC representatives certify, to the best of their knowledge and belief, the truth, accuracy and completeness of the application for their respective areas of responsibility.

CLOSURE PLAN FOR THE X-326 STORAGE UNIT
PORTSMOUTH GASEOUS DIFFUSION PLANT

Date Issued —

Prepared for the
U.S. Department of Energy
Office of Environmental Restoration and Waste Management

~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC
Managing the
DECONTAMINATION AND DECOMMISSIONING AND
Environmental Remediation Activities at the
Portsmouth Gaseous Diffusion Plant
under contract DE-AC30-10CC40017
for the
U.S. DEPARTMENT OF ENERGY

SUBMISSION DATE:

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CLOSURE PLAN FOR THE X-326 STORAGE UNITS

1. FACILITY DESCRIPTION

1.1 GENERAL DESCRIPTION

The Portsmouth Gaseous Diffusion Plant (PORTS) is owned by DOE and is contractor managed by ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. For the purposes of this permit application, DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC are Co-Operators of the X-326 Hazardous Waste Storage Units.

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio (see Figure 1).

PORTS has operated since 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment was accomplished by the gaseous diffusion process. As of 1993, all uranium enrichment operations at PORTS are conducted by the United States Enrichment Corporation (USEC), formed as a government-owned corporation by the Energy Policy Act of 1992 that became private in July 1998. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and demolition activities, and operation of nonleased facilities.

As a result of historical enrichment operations, which is typical of large industrial plants, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes.

The X-326 Storage Unit is located in the central part of the PORTS site (see Figure 2). The X-326 Building was in use from 1956 through 2001 for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes. The storage areas are located on the first floor towards the south end of the building (see Figure 3).

The X-326 Storage Unit is intended for the storage of high assay uranium bearing hazardous wastes until further uranium classification, or off-site shipment for recovery, treatment, or disposal is completed. Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in the Part A Permit Application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the East Cage and the West Cage). Storage area floors are primed and finished with a urethane-based sealant. All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed of concrete.

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1.1.1 TOPOGRAPHIC MAP

The U.S. Geological Survey (USGS) topographic map for the facility is shown in Section B, Figure B-2. Topographic details of the X-326 Storage Unit area are shown on Figure 3.

1.2 HYDROGEOLOGIC INFORMATION

1.2.1 GEOLOGIC AND HYDROLOGIC SETTINGS

The PORTS facility lies near the western margin of the Appalachian Highlands within the Appalachian Plateau Province. The physiography of this area is typified by rugged, irregularly dissected hills and ridges separated by generally mature drainage systems. The topographic highs are erosional remnants of the more competent units of the Paleozoic bedrock which underlie the area.

The facility lies to the south of the terminus of Pleistocene glaciation, however, two distinct physiographic features of glacial origin are present in the area. The most prominent of these features are large flat expanses of glacio-lacustrine deposits which fill preglacial topographic depressions. Deeply incised stream valleys which formed during periods of high flow resulting from glacial meltwater are also present locally.

Most of these valleys are partially filled with alluvial material and many are occupied by streams which are orders of magnitude smaller than the ones which originally formed the valleys.

The PORTS facility is situated on one of the glacio-lacustrine deposits formed when drainage of the preglacial Teays River was obstructed and prehistoric Lake Tight was impounded. Lake Tight occupied both the main Teays River valley and many of its tributary valleys, including the Portsmouth and Newark River valleys. Fine-grained sediments accumulated within Lake Tight, forming lacustrine deposits of silt and clay as much as 50 feet thick. Figure 4 exhibits regional stratigraphic information at the PORTS facility.

Bedrock in the area consists of sedimentary strata of marine origin which were deposited during the Paleozoic Era. The formations which comprise the bedrock beneath the PORTS facility belong to the Waverly Group, and they are described below.

The Cuyahoga Formation is comprised of sandstone, conglomerate, and shale. Locally the Cuyahoga is predominantly composed of gray shale, and it is present on both the east and west side of the facility where it outcrops on the hills. The Cuyahoga formation is 250 to 300 feet thick.

The Sunbury shale is described as a hard, "bony", fissile shale. It is typically highly carbonaceous and black in color. The unit averages 20 feet in thickness throughout its known range, and it has been reported to have a maximum thickness of about 30 feet. However, the formation is highly variable, and in the vicinity of the PORTS facility the Sunbury averages only 8 to 10 feet in thickness. The Sunbury may have been removed from some areas due to erosion either before the deposition of the Lake Tight sediments (Teays formation) or in relatively recent times.

**Clean-Copy Replacement Pages
Current Permit**

SUBMISSION DATE: **OCT 15 2010**

EPA I.D. Number (enter from page 1)		Secondary I.D. Number (enter from page 1)	
OH7890008983			
VII. Operator Information (see instructions)			
A. Name of Operator			
U. S. Department of Energy Fluor-B&W Portsmouth LLC, Co-Operator			
Street or P. O. Box			
P. O. Box 700			
City or Town		State	ZIP Code
Piketon		Ohio	45661
Phone Number (area code and number)		B. Operator Type	C. Change of Operator Indicator
(859) 219-4000 (DOE) (740) 897-2331 (Fluor-B&W Portsmouth LLC)		F	Yes X No
Date Changed		1/17/2011	
VIII. Facility Owner (see instructions)			
A. Name of Facility's Legal Owner			
U. S. Department of Energy, Portsmouth/Paducah Project Office			
Street or P. O. Box			
1017 Majestic Drive, Suite 200			
City or Town		State	ZIP Code
Lexington		KY	40513
Phone Number (area code and number)		B. Owner Type	C. Change of Owner Indicator
(859) 219-4000		F	Yes No X
Date Changed			
IX. SIC Codes (4-digit, in order of significance)			
Primary		Secondary	
2819	Industrial Inorganic Chemicals nec		
Secondary		Secondary	
X. Other Environmental Permits			
A. Permit Type/Number	B. Description	C. Permit	
01000000	DOE NPDES Permit	Permit to Discharge	

64983
SUBMISSION DATE: JUN 20 2007

For EPA Regional Use Only		<h1 style="text-align: center;">Hazardous Waste Permit Application Part A</h1>		For State Use	
Date Received					
I. ID Number(s)					
A. EPA ID Number			B. Secondary ID Number (if applicable)		
OH7890008983					
II. Name of Facility					
Portsmouth Gaseous Diffusion Plant					
III. Facility Location (Physical address not P. O. Box or Route Number)					
A. Street					
3930 U.S. Route 23 South					
City or Town		State		ZIP Code	
Piketon		Ohio		45661	
County Code (if known)	County Name				
	Pike				
B. Land Type (enter code)	C. Geographic Location LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)		D. Facility Existence Date	
F	39E 00' 030"	083E 00' 028"		01/14/1955	
IV. Facility Mailing Address					
Street or P. O. Box					
P. O. Box 700					
City or Town		State		ZIP Code	
Piketon		Ohio		45661-0700	
V. Facility Contact (Person to be contacted regarding waste activities at facility)					
Name (last)		(first)			
Murphie		William E.			
Job Title		Phone Number (area code and phone number)			
Manager, Portsmouth/Paducah Project Office		(859) 219-4000			
VI. Facility Contact Address (See instructions)					
A. Contact Address		B. Street or P. O. Box			
Location	Mailing X	1017 Majestic Drive, Suite 200			
City or Town		State		ZIP Code	
Lexington		KY		40513	

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JUN 20 2007

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SECTION B FACILITY DESCRIPTION

B-1 General Description [3745-50-44(A)(1)]

This facility description section is intended to provide the permit application reviewer with a general overview of the Portsmouth Gaseous Diffusion Plant (PORTS) facility and the activities conducted at the site by the U. S. Department of Energy (DOE). The RCRA Part B Hazardous Waste Permit Application that comprises this document is for a final permit for container storage unit X-326 and is divided into Sections A through N. Documents and information required to support a particular section are provided within that section. Section A of this permit comprises the requirements of the "Part A" permit application for the X-326 hazardous waste storage unit at PORTS.

PORTS is owned by DOE and is contractor managed by Fluor-B&W Portsmouth LLC. For the purposes of this permit application, DOE and Fluor-B&W Portsmouth LLC are Co-Operators of the X-326 Hazardous Waste Storage Units. Currently, DOE activities at PORTS employ approximately 200 people. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

U.S. Department of Energy
Portsmouth/Paducah Project Office
Attention: William E. Murphie, Manager
1017 Majestic Drive, Suite 200
Lexington, KY 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Melda J. Rafferty
P.O. Box 700
Piketon, OH 45661

0001 SUBMISSION DATE: JUN 20 2007

The U.S. EPA identification number for DOE Operations at PORTS is:

OH7890008983

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a 3,714-acre federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio, as shown in Figure B-1. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio. Major site facilities are shown in Figure B-2. Figures B-3 through B-6 each present one-quarter of the site in greater detail with topographic contours.

PORTS began operating in 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment is accomplished by the gaseous diffusion process.

Beginning in 1993, all uranium enrichment operations at PORTS were conducted by the United States Enrichment Corporation, formed as a government-owned corporation by the Energy Policy Act of 1992, that became private in July 1998. In May 2001, USDOE placed the gaseous diffusion plant in cold standby, through a contract with USEC, to maintain the facilities for possible restart within 18–24 months in the event of a significant disruption in the nation's supply of enriched uranium. USDOE continued the plant in cold standby through September 2005 and has since transitioned the gaseous diffusion plant into cold shutdown in preparation for future decontamination and decommissioning of the facilities. USEC continues to lease the facilities under the Nuclear Regulatory authorization. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, and operation of nonleased facilities.

As a result of historical and current operations at the site a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes. Table B-1 shows the status of active hazardous waste management units at PORTS and includes the hazardous waste container storage unit X-326. A description of X-326 are provided in the paragraphs that follow. Table B-2 provides a listing of solid waste management units at PORTS.

SECTION C

WASTE CHARACTERISTICS

C-1 CHEMICAL AND PHYSICAL ANALYSIS [3745-50-44(A)(2), 3745-54-13]

The Portsmouth Gaseous Diffusion Plant (PORTS) is a large, industrial, chemical processing complex that generates a variety of wastes. The Department of Energy (DOE) is responsible for environmental restoration and waste management at the site. The gaseous diffusion process buildings and related facilities were leased to United States Enrichment Corporation (USEC) on July 1, 1993. USEC is responsible for the waste generated as a result of the cold shutdown activities associated with the gaseous diffusion plant. DOE has begun decontaminating and decommissioning of inactive facilities under CERCLA. DOE will be generating waste throughout the D&D process. The X-326 container storage unit is used to store waste generated by DOE from current environmental restoration and waste management activities and waste generated prior to the lease agreement with USEC. Some USEC-generated wastes are also stored in the container storage units. Limitations on the storage of USEC Land Disposal Restriction wastes are provided by a separate Director's Finding and Orders for USEC. DOE and Fluor-B&W Portsmouth, LLC are not responsible for compliance with the USEC Order.

Waste managed by DOE includes a variety of closure and remediation wastes, such as excavated soils, wastewater treatment sludge, neat trichloroethylene, and decontamination and decommissioning waste.

All of the hazardous wastes generated at PORTS by DOE are currently assumed to include radioactive material from DOE operations and must be stored onsite as mixed (hazardous and radioactive) waste. Wastes determined to be mixed wastes are managed at the X-326 container storage units or shipped to a licensed facility until approved treatment and disposal methods for mixed wastes are available. If sufficient documentation is developed to demonstrate that a waste contains no added radioactive constituents, the waste will be shipped offsite to a commercial treatment, storage, disposal, or recycling facility.

The hazardous wastes generated by diffusion-related activities consist of oils, solvents, and other cleaning agents produced in decontamination and maintenance activities. These hazardous wastes are predominantly characterized on the basis of process knowledge. PORTS assumes that suspected contaminants are present until further investigation and/or analysis proves the constituents are not present or are present at concentrations below characteristic regulatory thresholds. All hazardous wastes are stored in the container storage units located within the X-326. A detailed description of these units is presented in Section D.

The following text and Table C-1 provide a brief description of each hazardous waste stream stored at PORTS. These descriptions include the following information for each waste stream: the hazardous characteristic or nature of each waste stream and the basis for characterization. The constituency and hazardous waste code designations provided represent a survey of the general nature of each waste stream. Proper storage of all wastes is ensured through the use of the waste stream review/analysis procedures provided in Section C-2.

Plant wide (PW) waste streams describe generated waste from PORTS activities. The PW waste streams are based on how the wastes are managed more than how and where the wastes were generated. For example, combustible liquids may be generated from similar processes in many PORTS buildings, but all combustible

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liquids can be managed as one waste stream. Waste treatment technologies may vary within a waste stream depending on the type and concentration of the hazardous constituents and other regulatory concerns.

The list of waste streams presented in Table C-1 includes a brief explanation of the basis for characterization for each waste stream. PORTS most commonly uses its understanding of generating processes, manufacturer's knowledge and materials used to characterize its wastes, and Table C-1 reflects this characterization. PORTS often uses Material Safety Data Sheets (MSDSs) in support of its waste characterizations based on process knowledge. PORTS conducts analysis for wastes to confirm characterization. Table C-1 indicates whether or not analysis exists and example analytical reports are presented in Appendix C-1. In addition, representative MSDSs used to support waste characterization are presented in Appendix C-2. When new/additional products are used on-site, MSDSs for these products will be maintained as part of the Hazard Communication Program. When any of these MSDSs are used to support waste characterization, the MSDS will be added to the operating record. All data supporting waste characterizations are maintained in the facility operating record for a minimum of 3 years. Records may be maintained as a hard copy or as an electronic duplicate.

DEBRIS

This waste stream is a combination of all previous debris waste streams and encompasses wastes such as equipment components, filters, masonry, personal protective equipment, rags, wipes, plastic, glassware, radioactively contaminated light bulbs, and radioactively contaminated batteries. Debris may be generated from most PORTS processes, and may be contaminated with organics and/or metal constituents (PW-201). This waste stream does not include items containing elemental mercury or labpacks, which are addressed in other PORTS waste streams. The characteristics of the debris will be determined on a case-by-case basis. The waste stream description for debris is not intended to meet the definition for debris in OAC 3745-270-02. The quantities of waste generated annually and in storage will vary.

SOIL

Soils become contaminated as a result of hazardous material spills and environmental releases, and soil waste streams are generated through spill cleanup, environmental restoration, and decontamination and decommissioning activities. Soils may be contaminated with organics and/or metal constituents (PW-202). The characteristics of the soil will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

AQUEOUS LIQUIDS

Most aqueous liquids are generated from equipment decontamination, de-watering operations, liquid spill recovery, and laboratory sample preparation and analysis. Aqueous liquids may be corrosive (D002) and contaminated with organics and/or metal constituents (PW-203). The characteristics of these liquids will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

SECTION G-RCRA HAZARDOUS WASTE CONTINGENCY PLAN

[OAC 3745-50-44 (A)(7), 3745-54-50 through 56]**Overview and Purpose of Plan**

This Contingency Plan describes the actions facility personnel will take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents to air, soil, or surface water. To fulfill this purpose, the plan will be implemented immediately whenever one or more of these occurrences could threaten human health or the environment.

This document, as Section G of the Portsmouth Gaseous Diffusion Plant (PORTS) Part B Permit Application, is being provided as a stand-alone document which amends the facility's emergency plan (Portsmouth Emergency Plan) as allowed for in OAC 3745-54-52 (b) and 40 CFR 264.52 (B). While the Portsmouth Emergency Plan integrates the plant's planning processes into a single document designed to mitigate the consequences of an emergency, this Contingency Plan stands alone for response to hazardous waste incidents.

This Hazardous Waste Contingency Plan contains the following elements:

- Designation and responsibilities of personnel who are to act as emergency coordinators,
- Implementation procedures for instructions on how and when the plan will be followed,
- Descriptions of both plant internal and external alarms and notification systems,
- Assessment methods and control actions should an emergency occur,
- Location, description and capabilities of emergency equipment at the facility,
- Agreements with USEC and with local authorities and medical centers, for providing emergency management and fire protection,
- Details of evacuation plans, and
- Record keeping and incident reports

Philosophy

At PORTS, the shared philosophy on emergencies is to prepare and maintain emergency plans dedicated to principles of personnel safety, environmental protection and safe equipment operation. Consequently, the response measures provided within this plan are designed to provide maximum protection for both onsite and offsite personnel, limit damage to facilities and equipment, limit adverse impacts on the environment and minimize impacts on site operations and security. The following PORTS philosophy indicates our commitment to personnel safety and the protection of the environment.

"The emergency philosophy of the Portsmouth Gaseous Diffusion Plant (PORTS) is to provide and maintain emergency plans that are dedicated to the following principles; in order, personal safety, environmental protection, and safe equipment operation." Contamination control issues and environmental protection concerns are to be addressed by emergency responders following the identification, recovery and condition assessment/treatment of ill or injured personnel.

This policy shall be applied and enforced comprehensively; however, provision must be made for deviations during emergency operations -- thus allowing the Emergency Coordinator to be in a position to make decisions based upon circumstances found at the time of an emergency.

Copies of Contingency Plan [OAC 3745-54-53]

Although not listed on the Part B Permit Application checklist, this section is required by the referenced regulations. A copy of the Contingency Plan and all revisions are provided to all applicable departments at PORTS. These include: custodians of hazardous waste storage units, the United States Enrichment Corporation (USEC) Emergency Preparedness Department, the USEC Fire Department, the USEC Police Department and the USEC Plant Shift Superintendent's office.

USEC, as part of an agreement to provide emergency management and fire protection service, obtains Letters of Agreement (LOAs) with offsite emergency planning and/or response organizations that have agreed to assist in the event of an emergency at

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PORTS. The Department of Energy (DOE)/Fluor-B&W Portsmouth LLC provides copies of the RCRA contingency plan to these organization as well as other interested stakeholders. This combined distribution list includes the following:

Adams County

Peebles Fire Department

Scioto County

Southern Ohio Medical Center

Post 73, Ohio State Highway Patrol

Scioto County Sheriff

Scioto County Local Emergency Planning Committee

Valley Local Schools

Scioto County Emergency Mgmt. Agency

Pike County

Pike Community Hospital

Pike County Sheriff

Pike County Emerg. Medical Service (6)

Scioto Township Volunteer Fire Dept

Beaver Volunteer Fire Department

Piketon/Seal Township Vol Fire Dept

Elm Grove Volunteer Fire Department

Stockdale Volunteer Fire Department

Waverly City Schools

USEC

Word Alive Fellowship

Pike County Fire Fighters Association

Pike County Local Emerg. Plng. Com.

Ohio Division of Forestry - Pike State Forest

Waverly Fire Department

Benton Township Volunteer Fire Department

Jackson Township Volunteer Fire Dept

Camp Creek Township Fire Department

Pebble Township Vol. Fire Department

Pike County Schools

Brush Creek Township Volunteer Fire Dept.

Franklin Township Volunteer Fire Department

Ross County

Adena Regional Medical Center Hospital

Others

Ohio Environmental Protection Agency (3)

United States Environmental Protection Agency

United States Department of Energy

Ohio Emergency Management Agency (OEMA)

Amendment of Contingency Plan [OAC 3745-54-54]

When the Contingency Plan is revised, PORTS provides documentation to U.S. Department of Energy (DOE), and regulatory agencies, and all departments and organizations currently on the above plan distribution list. The correspondence for distribution of a revised Contingency Plan includes an offer to familiarize the receiving organization with the changes in the plan.

G-1 General Information [OAC 3745-54-52]

The container storage units at PORTS are owned by DOE and are co-operated by DOE and Fluor-B&W Portsmouth LLC. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 US 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

Department of Energy
William E. Murphie, Manager
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

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The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Melda J. Rafferty
P.O. Box 700
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to Fluor-B&W Portsmouth LLC from USEC through a service agreement incorporated into the lease.

Location and Site Plan

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on 3,714.01 federally-owned acres. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product requires the use of numerous hazardous chemicals.

Employment at this facility is approximately 1750-2200.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

Planning Area

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents. This area is the two-mile immediate notification area (INA), within a two-mile radius of the center of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Alert System Radio Station Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

No schools are located within the immediate notification area. However, county school buses frequently travel all roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

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Land Use

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

Transportation Routes

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

Hazardous Waste Storage

X-326 Container Storage Unit

The X-326 Storage Unit (See Figure G-1) is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are six areas of the building, totaling approximately 31,888 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The X-326 Storage Unit is intended for the storage of high assay uranium-bearing hazardous and/or polychlorinated biphenyl wastes until further processing for uranium recovery or treatment through a permitted process is obtained. The wastes will include aqueous laboratory solutions, spent laboratory solvents and decontamination solutions from other buildings on plantsite. All containers will be constructed to Department of Transportation (DOT) specifications where available. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes.

The X-326 Storage Unit was designed and intended for the storage of high assay uranium bearing wastes until further processing for uranium recovery or treatment through a permitted process, such as a National Pollutant Discharge Elimination System-permitted discharge. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes. The wastes that may be stored in the X-326 Storage Unit include aqueous laboratory solutions, spent laboratory solvents, and decontamination solutions from several other buildings on the plantsite.

The waste that may be stored in the X-326 RCRA unit are the following: product and process waste designated as RCRA types F, P, and U, RCRA characteristic wastes, "mixed wastes" (both radioactive and hazardous wastes) and combinations of the above wastes. The majority of the wastes stored in the X-326 building are from environmental restoration activities and non-halogenated solvents and/or radioactive wastes from laboratories, decontamination solutions, and a variety of plant processes and clean-up operations. The remainder of the wastes are from a variety of diffusion process activities and are primarily toxic due to metal and solvent constituents.

The wastes are stored in a variety of containers, but are usually stored in DOT approved 55-gallon drums or 5-inch diameter/10-liter polyethylene bottles. Other containers as listed in Table D-2 of Section D of this application may also be used. The containers are stored on steel supports or are placed into support sleeves which are raised above the floor to prevent contact with potentially inadvertent standing liquid introduced into the area.

The X-326 Storage Unit is located in the south end on the first floor of the X-326 Process Building. Figure D-1 shows the floor plan for the X-326 Storage Unit. The X-326 Building is totally enclosed with a built-up roof, transite walls and concrete floors. Heating and cooling is provided as needed in the RCRA-permitted storage areas. The area around the building is sloped to direct run-on and run-off water to the PORTS storm sewer system.

Approximately 38,105 square feet of the X-326 is designated as storage space and will be used as required until final-closure is initiated.

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is Danny Nichols. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between Fluor-B&W Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

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5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.
6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
 - C. Use of water or water and chemical fire suppressant could result in contaminated runoff.
2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
 - B. The spill could cause the release of toxic liquids or fumes.
 - C. The spill can be contained onsite, but the potential exists for groundwater contamination.
 - D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health, or the environment, he will report his findings as follows:

1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
3. To Ohio Emergency Response Team at 800/282-9378.

G-4 Emergency Response Procedures [OAC 3745-54-52 (A)]

The PORTS USEC Emergency Response Organization is prepared to respond by agreement to emergencies involving DOE facilities or requiring DOE assistance. The Emergency Response Organization is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers, public health and safety, and the environment.

The Emergency Response Organization is staffed with trained personnel who are required to participate in formal training, drills and exercises and respond if notified of an incident. The incident type and severity dictate the level of Emergency Response Organization activation.

The Emergency Response Organization has the following specific functions and responsibilities depending on the incident and level of response needed to mitigate the problem: event categorization, determination of emergency class, notification, provision of protective action recommendations, management and decision making, control of onsite emergency activities, consequence assessment, protective actions, medical support, public information, activation and coordination of onsite response resources, security, communications, administrative support and coordination and liaison with offsite support and response organizations.

Field Response

The Plant Shift Superintendent is delegated the responsibility by PORTS Environmental Management & Enrichment Facilities Site Manager to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The Incident Command System (ICS) is used by PORTS response for managing an incident at the scene. The Incident Command System provides a standard system for responding to all types of incidents. The two major functions of the Incident Command System are safety and efficiency. The system consists of personnel, facilities, equipment, communications and procedures operating within an organized structure to accomplish control of the incident.

When the Plant Shift Superintendent responds to the incident scene and takes charge, the Plant Shift Superintendent becomes the Incident Commander. The Incident Commander establishes a command post at a safe distance away from the incident scene in an upwind direction. All requested field response units report to the command post and receive directions from the Incident Commander for response actions.

All emergency personnel should be provided with as much information as possible, concerning the nature and hazards of the incident they are responding to. This information should include wind direction and speed, possible location of the Command Post, and any areas to avoid. Any changes in the conditions at the incident scene must be passed quickly to all responders.

The Plant Shift Superintendent/Incident Commander is located in the X-300 Plant Control Facility (PCF) which serves as the 24-hour point of contact for all emergency notifications. The Plant Shift Superintendent/Incident Commander:

- Provides continuous site-wide emergency direction;
- Directs the effort to respond to an incident;
- Assesses the incident and makes initial categorization/classification;
- Alerts and mobilizes sufficient response forces, including technical assistance, to respond to the requirements of the emergency;
- Directs plant or facility shutdown if necessary in accordance with existing plans and procedures; and
- Ensures communications with the Emergency Operations Center (EOC), when appropriate.
- Emergency responders who routinely report to the Command Post include:
 - Plant Shift Superintendent/Incident Commander
 - Response Safety Officer
 - Police Force
 - Local Emergency Director
 - Fire Department

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The following organizations are called on by the Incident Commander, when necessary:

- Environmental Compliance
- Industrial Hygiene
- Nuclear Safety
- Maintenance
- Waste Management
- Health Physics
- Medical
- Utilities
- Facility Operations

In addition, offsite Emergency Response Organizations are available to assist the onsite Emergency Response Organization when needed.

Emergency Operations Center

When the Emergency Operations Center becomes operational, overall command and control of the PORTS Site Emergency Response is transferred to the Crisis Manager, allowing the Incident Commander to focus on conditions and mitigation at the emergency scene. The Emergency Operations Center is located in the X-1020 Building and becomes the primary facility for coordinating onsite response and mitigation and offsite interface activities. The Emergency Operations Center is composed of an emergency information center where members of Senior Management and advisors operate, coordinate activities and communicate with onsite and offsite personnel; a Crisis Management Room (CMR) where the Crisis Management Team (CMT) is stationed to follow events and direct actions; a Technical Support Room (TSR) where the TSR Coordinator advises and directs the activities of the technical support group; a radio room where personnel monitor and transmit information; a computer room which houses the information management system; and an area where security personnel coordinate the activities of the protective force. The emergency line of executive succession for the Crisis Manager's position is shown in the next section.

The Plant Shift Superintendent will activate the Emergency Operations Center in the event of any emergency classification: alert or site area emergency. The Emergency Operations Center may be activated at any classification level or when deemed necessary.

The Plant Shift Superintendent or alternate or the Enrichment Plant Manager or alternate are authorized to activate the Emergency Operations Center. Alternate Emergency Operations Centers include the X-300 Plant Control Facility and the Mobile Communications Vehicle. Emergency Operations Center service is by an agreement between USEC and Fluor-B&W Portsmouth LLC.

Emergency Line of Executive Succession

In the event of a significant emergency at PORTS, emergency executive succession of command shall be in the order listed below. If none of the management listed are available in the plant, the Plant Shift Superintendent shall assume command as well as fulfill his responsibilities as Incident Commander. The Plant Shift Superintendent will be relieved of the executive command duties by the first person to arrive as identified from the list below. PORTS does not consider those named on the list of "Emergency Line of Executive Succession" to be Emergency Coordinators. The Plant Shift Superintendent/Incident Commander continues his obligations for oversight of the emergency response.

- General Manager
- Plant Manager
- Other personnel as designated by the General Manager and trained and qualified as Crisis Manager

G-4A Notification [OAC 3745-54-56 (A)]

This section describes the methods used for notifying PORTS Emergency Response Forces, other plant personnel and appropriate Local, State and Federal Agencies in time of an emergency.

Notification refers to required communication within mandated time frames and according to a predetermined sequence, of general information on the nature and severity of an emergency event. Notification is different from reporting because it must occur without delay for the purpose of alerting or activating, rather than informing. Notification requirements vary according to reported event level and may continue to change depending upon preliminary classification, ongoing assessments, full classification and any changes in classification.

The Plant Shift Superintendent is responsible for categorizing an event as an emergency and assigning an emergency classification. The Plant Shift Superintendent is responsible for initial notifications in accordance with Federal and State Regulations. Subsequent notifications may be the responsibility of the Plant Shift Superintendent in his role as Incident Commander or the Crisis Manager after the PORTS Emergency Operations Center becomes operational.

In any event, a prearranged format is used to ensure that the content of the notification message(s) includes the emergency classification, whether a hazardous substance and toxic chemical, hazardous waste or hazardous waste constituent, mixed waste or mixed waste constituent release is occurring or expected and identification of the response and/or protective actions taken or recommended.

Figure G-3, Emergency Notification Form (or a similar form that meets RCRA regulatory requirements), is used for notification of an emergency. Predesignated offsite agencies are notified within 15 minutes of classification of an emergency.

Primary and Alternate Systems

Primary and alternate systems are in place for notifications to the Emergency Response Organization and offsite agencies. Periodic testing is conducted according to site Emergency Preparedness Implementing Procedures.

Notification of Onsite Personnel

Members of the PORTS Emergency Response Organization are notified of a need to respond to an emergency by a variety of ways including automatic alarms, pagers, radios, public address system and telephones.

Plant personnel not assigned to the Emergency Response Organization receive notification of an onsite emergency condition by one of eight different alarms followed by announcements over the plant's public address system. An example of plant alarms includes a continuous sounding alarm that means for plant personnel to evacuate a building and go to their assigned assembly area. To account for all plant personnel, the accountability alarm consists of seven (7) short blasts repeated three (3) times.

Notification of State and County Governments

Telephone notification is made to the Pike County 24-hour Contact Point and the Ohio Emergency Management Agency and the Ohio Environmental Protection Agency. When a site area emergency is declared, the notification to the county's 24-hour Contact Point will include a reminder that at upon the site area emergency classification, the public warning system will be activated to notify the residents in the two-mile immediate notification area (INA).

The public warning system consists of five outdoor warning sirens, tone alert radio receivers, and the Emergency Broadcast System (EBS).

Notification of DOE

Notification to DOE Headquarters, the Portsmouth/Paducah Project Office, and the DOE Oak Ridge Field Office is made by telephone or verbal or facsimile messages.

Notification of Fluor-B&W Portsmouth LLC Corporate Personnel

Corporate personnel are notified of an emergency at PORTS by telephone or verbal or facsimile messages.

G-4B Identification of Hazardous Substances and Toxic Chemicals [OAC 3745-54-56(B)]

Upon arrival at the scene of an emergency, the Plant Shift Superintendent/Incident Commander will immediately make an assessment of the character, source, amount and extent of the release that has occurred. Resources such as storm sewer and water line drawings used to identify potential flow/contamination paths are shown in Figure G-4.

In the event of a release, fire, or explosion, the identification of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents in the X-326 Waste Storage Units would be accomplished by direct observation of the leaking container or by the container inventory system maintained by the Waste Management (WM) Division.

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This system maintains an accountability for each container. The record for a container includes the generator data, analytical results and location in the storage unit. Because the wastes are segregated by compatibility and type, the location of the emergency may identify the material. The accountability systems are updated as frequently as necessary (often daily) to maintain an accurate container inventory.

The container inventory system is computerized with backup of data in a filing system. The data for any given container can be accessed from a computer terminal within five (5) minutes. Communications with Waste Management would be by telephone or radio. Should power be interrupted, and the computer system become inoperable, the paper back-up filing system would be used.

By the location of the incident, Waste Management personnel could locate the proper files which will reveal the contents of the containers involved. A third method of identification is the collection and analysis of samples. All sampling of air, soil, water, or pooled wastes will be performed in accordance with established standards, such as SW-846, ASTM, or others. All analyses will be performed in accordance with regulatory agency approved methods, such as SW-846 or in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.

G-4C Hazard Assessment [OAC 3745-54-56 (C)]

In the event of an emergency, the Plant Shift Superintendent/Incident Commander has at his disposal any and all personnel and resources to assist and/or advise in the assessment of the situation and its amelioration. The Plant Shift Superintendent/Incident Commander will base the assessment on all available information including process knowledge, material safety data sheets, models of air, surface water or groundwater flow patterns, and specific health based environmental criteria or limits which may be exceeded. Environmental surveillance air sample data, at a minimum, will be collected and evaluated. By utilization of this existing database and trained personnel, the Plant Shift Superintendent/Incident Commander will be able to assess both the direct and indirect effects potentially caused by the emergency. Personnel routinely available to the Plant Shift Superintendent/Incident Commander for advice and consultation include those with skills and experience in chemistry, biology, engineering, industrial hygiene, safety, regulatory compliance, process engineering and operations, health physics, medicine and other sciences. Key personnel are on call to respond to the Plant Shift Superintendent/Incident Commander at any time. If the appropriate personnel are not promptly available, the Plant Shift Superintendent/Incident Commander has been granted the authority by plant management to act on the available information and to utilize his best judgment. Existing plant emergency procedures, methods, and policies, with which the Plant Shift Superintendent/Incident Commander and the Shift Emergency Response Organization are routinely trained and exercised, provide the Plant Shift Superintendent/Incident Commander with the assistance to exercise his best judgement with confidence.

If the assessment of the emergency situation indicates that evacuation of plant personnel is required, the Plant Shift Superintendent/Incident Commander will notify the necessary personnel and area or building evacuation will be initiated. If it is determined that offsite populations must be evacuated, the Plant Shift Superintendent/Incident Commander will follow the guidelines as set forth in this contingency plan and local community response plans.

This Section also describes the protective actions developed to limit exposure of plant personnel and the public during an emergency at PORTS.

Protective Actions for Onsite Personnel

Protective actions for onsite personnel (including visitors and contractor personnel) includes alerting, assembly and accountability, evacuation, monitoring and decontamination.

Plans have been developed for protection and accountability of onsite personnel within 45 minutes (not to exceed 60), including identification of special conditions, locations of assembly areas and provisions for onsite sheltering-in-place. Upon notification of an emergency by the Plant Shift Superintendent, emergency response forces proceed to their response locations. Plant personnel not assigned an emergency response position and contractors proceed to a designated monitoring station or assembly point. Visitors remain with their escorts and are accounted for.

Evacuation of personnel is ordered by the Plant Shift Superintendent or Crisis Manager whenever it is determined that a threat to the safety of plant personnel exists. Directions on the specific evacuation routes are provided. The appropriate decision of an assembly point and evacuation route is determined based upon plant conditions, wind direction and weather.

4. Following abatement of the emergency, all impounded runoff will be characterized. Sampling and analysis, if necessary, will be performed in accordance with agency-approved methods such as SW-846, or, in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.
5. If the runoff is determined to be hazardous, the runoff will be treated or disposed of in accordance with applicable RCRA regulations.
6. Following removal of the water from the containment areas, a soil sampling program will be initiated to determine if the soil has become contaminated.

G-4G Incompatible Wastes [OAC 3745-54-56(H)(1)]

Determinations of chemical characteristics and incompatibilities by the Plant Shift Superintendent/Incident Commander can be done with visual inspections, field sampling and by knowledge of the waste origination. The analytical procedures of the waste analysis plan and the waste management and segregation procedures of the storage units and their procedures to prevent hazards are also applicable to ensuring that there will be no incompatibility problems.

G-4H Post Emergency Equipment Maintenance [OAC 3745-54-56(H)(2) and (I)]

Following its use in an emergency or routine maintenance situation, all equipment is cleaned/decontaminated of hazardous substance and toxic chemical or residual excavated materials prior to being placed into storage for reuse as necessary. The purpose of the cleaning is twofold: 1) to maintain the equipment in usable condition; and 2) to prevent the spread of and/or unnecessary exposure to hazardous and/or radioactive materials.

Expendable supplies such as disposable personal protective equipment are inventoried and replaced as required as part of the decontamination activities. These decontamination activities are performed after the generated residues are containerized and sampled (as necessary) to ensure only compatible materials are stored together. The completion of the site cleanup is to include the maintenance of equipment and the replenishment of supplies, which will then be reported to the Administrator of Environmental Protection Agency (EPA) Region V, the Director of Ohio EPA and any other applicable state or local agency prior to the resumption of normal operations.

G-4I Container Spills and Leakage [OAC 3745-54-52(A)(E), 3745-55-71]

Spill control equipment shall be located and available in the hazardous waste storage units at all times. Waste Management operating procedures provide detailed steps for handling and replacing leaking containers.

The general procedure that is followed is:

1. The spill or leak is contained using an inert absorbent if it can be safely done by personnel detecting the spill or leak. Once the spill or leak is safely contained, clean-up activities shall begin immediately.
2. Chemical Operations personnel, Environmental Compliance personnel, the Plant Shift Superintendent/ Incident Commander, and, if necessary, emergency response personnel are notified to provide safe clean-up guidelines and equipment.
3. The contents of the drum will be transferred to a container as specified in Table D-1 or the drum and contents will be placed in an overpack drum as stated in the procedure.

Environmental Compliance will evaluate the occurrence against current regulations and determine the reporting requirements and, if necessary, draft appropriate notifications.

After the emergency has been abated, the transfer of additional hazardous wastes into the storage area will be discontinued until the area is properly cleaned. There is sufficient space in other onsite storage areas to accommodate this material for several weeks.

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G-4J Tank Spills and Leakage [OAC 3745-55-93]

PORTS is not seeking a permit for any tanks; therefore, this section does not apply.

G-4K Surface Impoundment Spills and Leakage [OAC 3745-56-27]

PORTS is not seeking a permit for any surface impoundments; therefore, this section does not apply.

G-5 Emergency Equipment [OAC 3745-54-52(E)]

Fire Extinguishing Equipment

The closest fire department is operated by USEC. This fire department maintains a full time dedicated fire department, which includes three pumps: 1 - with a 1250 gallons per minute (gpm) pump and 500 gallon booster tank; 1 - with a 1250 gpm pump and a 500 gallon booster tank and 1 - with a 1000 gpm pump and a 500 gallon booster tank; 1 - mini-pumper with 300 gpm pump and a 300 gallon booster tank, and a 4-wheel drive heavy rescue vehicle, and two ambulances. The department has a truck; for carrying all types of miscellaneous emergency equipment. In addition, the department operates several pickup trucks. Each vehicle and its complement of equipment is checked at the start of each shift and a complete inventory is taken each week. This equipment and staff are housed in a modern, eight bay, brick building known as the X-1007 Fire Station. Included in the fire station is a modern, computerized alarm room.

There are two separate firewater distribution systems at PORTS. The high-pressure fire water system services all sprinkler systems and the fire hydrants in the newer areas of the plant. It has a 4-hour fire flow of 16,000 gpm at 125 pounds per square inch (psi). The low-pressure system is also known as the sanitary water system and services the fire hydrants in the older area of the plant. It has a 4-hour fire flow of 5,000 gpm at 75 psi. Fire hydrant spacing on both systems is nominally 300 feet. Both hazardous waste storage units have building sprinkler systems on the high-pressure system. The fire hydrants in the area of X-326 are on the low-pressure system. The PORTS Fire Department is located in Building X-1007, about 1,000 feet from the storage unit.

Along with the fire protection systems at PORTS, the X-326 building has a set of portable fire extinguishers available. Each unit is inspected on a routine basis. NFPA Class A, B, C or combination extinguishers can be found in most areas and are generally located 75 feet apart or approximately one for each 1250 ft² of floor space per NFPA standards. These units are to be used for small fires (e.g. waste baskets, paper on desk) only, as general personnel are not trained to fight significant fires.

Emergency and Spill Control Equipment

The container storage units have an extensive array of emergency and spill control equipment available for routine and emergency use. All equipment is maintained on a preventative maintenance schedule as recommended by the manufacturer. The list of equipment is presented as Table G-2.

In addition to the emergency equipment, DOE/Fluor-B&W Portsmouth LLC has a wide variety of heavy equipment (lifting and earth moving) available for use, in an emergency, by agreement with USEC.

Personal Protective Equipment

PORTS maintains a wide variety of personal protective equipment including respiratory protection; protective clothing, including chemical-resistant encapsulating suits; and self-contained breathing apparatus. The types of respiratory protection available include organic vapor half-face, full-face and, fresh air respirators; and the aforementioned self-contained breathing apparatus. Protective clothing includes cloth coveralls, aprons, shoes, boots, various types of gloves and headgear. The chemical-resistant encapsulating suits are maintained by the USEC Fire Department Personnel who receive special training in the use, testing and inspection of such equipment.

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Emergency response personal protective equipment consisting of both Level A and Level B Equipment is assigned to and is either carried on fire vehicles or is stored in the X-1007 Fire Station.

Level A Equipment consisting of positive-pressure self-contained breathing apparatus, full-encapsulating chemical resistant suits with built-in gloves, steel shank boots, a hard hat and extra gloves are carried on the fire department emergency truck. Extra positive-pressure self-contained breathing apparatus and extra air bottles are also stored on this vehicle.

Level B Equipment is worn by all responding firemen and consists of complete fire turnout gear and self-contained breathing apparatus. Additional positive-pressure self-contained breathing apparatus is available on all fire apparatus except the two ambulances. These responders normally wear white cotton gloves under their regular work gloves, and have available to them plastic booties to wear over their boots, if such protection is needed.

Tyvec coveralls, cotton gloves, skull caps, respiratory protection, plastic booties, and extra air bottles are also carried on the emergency truck. An additional supply of these items are stored in supply cabinets in the X-1007 Fire Station.

Once the situation has been stabilized by the immediate response of the fire department and the potential hazards of fire and explosion have been reduced to an acceptable level, cleanup is completed by the USEC Chemical Operations Department with the Fire Department on standby. The personal protective equipment of the chemical operators is normally Level D and occasionally Level C. The level of protection is determined by the Industrial Hygienist after determining the nature of the material spilled, taking and evaluating instrument readings for that material, and consulting with the Plant Shift Superintendent/Incident Commander, fire captain and safety personnel so that all potential hazards are considered.

Internal Communications and Alarm Systems

PORTS emergency communications and alarms are established in a variety of methods. The most familiar and easily usable is the telephone. The dialing of the emergency number (911) on any plant telephone will automatically connect the caller with the USEC Fire Department. The caller will be requested to describe the nature of the emergency and location and be told to remain, if possible, at the scene until emergency personnel arrive.

Another familiar alarm device is the fire alarm boxes located in virtually every building on plantsite. When tripped, the alarms will sound in the fire department. Personnel sounding the alarm should remain as close to the alarm box as is safely possible in order to guide emergency response personnel to the occurrence scene.

Other alarms include bells, whistles, and horns which sound in a variety of ways depending on the nature and extent of the emergency. For example, in the event of an emergency, a personnel accountability alarm may be sounded (seven rings on a bell, repeated three times) and/or, if an evacuation is necessary, a horn will sound with a continuous blast.

Emergency communications may also be accomplished by means of hand held two-way radios. A dedicated emergency frequency is assigned, and an alternate frequency may be utilized, if necessary. All personnel who may have use of a two-way radio are instructed as to its proper use.

External

The telephone is the primary means of external communication. Both hazardous waste storage units have telephones. The Plant Shift Superintendent, Fire Department and Police-Department have radio capability to monitor and communicate directly with the area emergency responders. PORTS also has facsimile and electronic information transfer capability to communicate with those who have compatible equipment.

First Aid and Medical Equipment

PORTS has a doctor and nurses who can administer the full range of first aid and stabilization techniques to injured or ill personnel. The PORTS Hospital has an emergency room, examination suites and 3 holding beds. It is staffed on day-shift Monday through Friday excluding holidays with a physician on day-shift. The Fire Department maintains two fully equipped ambulances and most fire department personnel are certified Emergency Medical Technicians or Paramedics. These services are available through an agreement with USEC.

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Decontamination Equipment

Emergency decontamination equipment for injured personnel and responder decontamination is carried on the plant emergency truck, ambulances, and fire apparatus. Additional equipment and neutralizing solutions are stored in the X-1007 Fire Station or the X-101 Hospital. This equipment generally consists of responder protective equipment, decontamination solutions, solution containment devices, and contaminated clothing storage bags.

Gross decontamination of responders is generally accomplished by using safety showers or sanitary showers in affected buildings, with decontamination solutions being stored in proper containers awaiting characterization or by decontamination with portable hoses and/or sprayers. Decontamination solutions can be collected in portable pools for proper characterization, treatment and disposal.

Heavy equipment may be decontaminated by use of water hoses, portable high pressure water or steam cleaners. Prior to this step, all gross contamination is brushed off of the affected surfaces, to limit the concentration in the decontamination solutions. Solutions and solids potentially contaminated with hazardous constituents are collected, sampled and properly disposed of following analytical data review.

G-6 Coordination Agreements [OAC 3745-54-37, 3745-54-52(C)]

An agreement with USEC provides the services of an onsite hospital, fire department, and police department. As the primary provider of emergency services to DOE/Fluor-B&W Portsmouth LLC, USEC obtains and is responsible for updating mutual aid agreements with several surrounding communities for joint support for emergencies at PORTS or within the communities. Copies of the mutual aid agreements and other letters of understanding with the following agencies are attached.

Mutual Aid Agreement

Piketon-Seal Township Volunteer Fire Dept
Benton Township Volunteer Fire Dept
Camp Creek Township Volunteer Fire Dept
Elm Grove Volunteer Fire Dept
Jackson Township Volunteer Fire Dept
USEC Fire Dept
Peebles Fire Dept
Pike County Fire Fighters Association (fire departments listed are part of this association)
Ohio Division of Forestry – Pike State Forest
Pike County Sheriff's Department

Beaver Volunteer Fire Dept
Pebble Township Volunteer Fire Dept
Stockdale Volunteer Fire Dept
Waverly Fire Dept
Scioto Township Volunteer Fire Dept
Brush Creek Volunteer Fire Dept
Franklin Township Volunteer Fire Dept

Hospitals (LOA)

Pike County Emergency Medical Service, Waverly, Ohio
Pike Community Hospital, Waverly, Ohio
Southern Ohio Medical Center, Portsmouth, Ohio
Adena Regional Medical Center, Chillicothe, Ohio

Schools (LOA)

Pike County Schools
Valley Local Schools
Waverly City Schools, Waverly, Ohio

The remoteness of the plant from local communities would delay their emergency personnel's response time to PORTS in the event of an emergency. Therefore, USEC will be the primary emergency authority.

The Site Emergency Plan for an emergency at PORTS includes participation of county emergency forces. The plan also provides site orientation tours and classroom training biennially. The PORTS initial responders are intimately familiar with the facility and will have assessed the hazards and support needs prior to the arrival of offsite aid. For these reasons, PORTS will

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**Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)**

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Danny Nichols	Non-responsive	Non-responsive	Not Available
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

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Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.)

**ATTACHMENT M.1
1999 DIRECTOR'S FINAL FINDINGS AND ORDERS**

Fluor-B&W Portsmouth, LLC is not a party to the 1999 Director's Final Findings and Orders. With respect to Fluor-B&W Portsmouth, LLC's obligation to perform work under the 1999 Director's Final Findings and Orders, this obligation arises from Fluor-B&W Portsmouth, LLC's contract with DOE. Consequently, any obligations under the 1999 Director's Final Findings and Orders that Fluor-B&W Portsmouth, LLC may have through contract with DOE terminate when Fluor-B&W Portsmouth, LLC is no longer responsible under contract.

SUBMISSION DATE: MAY 25 2005

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**ATTACHMENT M.2
1989 CONSENT DECREE**

Fluor-B&W Portsmouth, LLC is not a party to the 1989 Consent Decree. With respect to Fluor-B&W Portsmouth, LLC's obligation to perform work under the 1989 Consent Decree, this obligation arises from Fluor-B&W Portsmouth, LLC's contract with DOE. Consequently any obligations under the 1989 Consent Decree that Fluor-B&W Portsmouth, LLC is no longer responsible under contract.

SUBMISSION DATE: MAY 25 2005

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SUBMISSION DATE: **OCT 15 2010**

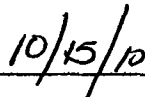
**SECTION N
CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy
Owner and Operator

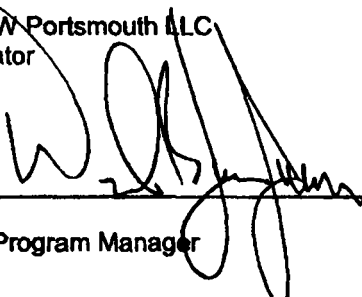


Site Manager



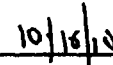
Date Signed

Fluor-B&W Portsmouth LLC
Co-Operator



BY:

Program Manager



Date Signed

The Department of Energy has signed this application for the permitted facility as owner and operator and Fluor-B&W Portsmouth LLC has signed as co-operator. The Department has determined that dual signatures best reflect the actual apportionment of responsibility under which the Department's RCRA responsibilities are for policy, programmatic, funding and scheduling decisions, as well as general oversight; and, the contractor's RCRA responsibilities for day-to-day operations, (in accordance with general directions given by DOE as part of its general oversight responsibility), including but not limited to, the following responsibilities: waste analysis and handling, monitoring, record keeping, reporting, and contingency planning. For purposes of the certification required by OAC 3745-50-42(D), the DOE and Fluor-B&W Portsmouth LLC representatives certify, to the best of their knowledge and belief, the truth, accuracy and completeness of the application for their respective areas of responsibility.

CLOSURE PLAN FOR THE X-326 STORAGE UNIT
PORTSMOUTH GASEOUS DIFFUSION PLANT

Date Issued —

Prepared for the
U.S. Department of Energy
Office of Environmental Restoration and Waste Management

Fluor-B&W Portsmouth LLC
Managing the
Decontamination and Decommissioning and
Environmental Remediation Activities at the
Portsmouth Gaseous Diffusion Plant
under contract DE-AC30-10CC40017
for the
U.S. DEPARTMENT OF ENERGY

SUBMISSION DATE: **OCT 15 2010**

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OCT 15 2010

CLOSURE PLAN FOR THE X-326 STORAGE UNITS

1. FACILITY DESCRIPTION

1.1 GENERAL DESCRIPTION

The Portsmouth Gaseous Diffusion Plant (PORTS) is owned by DOE and is contractor managed by Fluor-B&W Portsmouth LLC. For the purposes of this permit application, DOE and Fluor-B&W Portsmouth, LLC are Co-Operators of the X-326 Hazardous Waste Storage Units.

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio (see Figure 1).

PORTS has operated since 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment was accomplished by the gaseous diffusion process. As of 1993, all uranium enrichment operations at PORTS are conducted by the United States Enrichment Corporation (USEC), formed as a government-owned corporation by the Energy Policy Act of 1992 that became private in July 1998. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and demolition activities, and operation of nonleased facilities.

As a result of historical enrichment operations, which is typical of large industrial plants, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes.

The X-326 Storage Unit is located in the central part of the PORTS site (see Figure 2). The X-326 Building was in use from 1956 through 2001 for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes. The storage areas are located on the first floor towards the south end of the building (see Figure 3).

The X-326 Storage Unit is intended for the storage of high assay uranium bearing hazardous wastes until further uranium classification, or off-site shipment for recovery, treatment, or disposal is completed. Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in the Part A Permit Application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the East Cage and the West Cage). Storage area floors are primed and finished with a urethane-based sealant. All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed of concrete.

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1.1.1 TOPOGRAPHIC MAP

The U.S. Geological Survey (USGS) topographic map for the facility is shown in Section B, Figure B-2. Topographic details of the X-326 Storage Unit area are shown on Figure 3.

1.2 HYDROGEOLOGIC INFORMATION

1.2.1 GEOLOGIC AND HYDROLOGIC SETTINGS

The PORTS facility lies near the western margin of the Appalachian Highlands within the Appalachian Plateau Province. The physiography of this area is typified by rugged, irregularly dissected hills and ridges separated by generally mature drainage systems. The topographic highs are erosional remnants of the more competent units of the Paleozoic bedrock which underlie the area.

The facility lies to the south of the terminus of Pleistocene glaciation, however, two distinct physiographic features of glacial origin are present in the area. The most prominent of these features are large flat expanses of glacio-lacustrine deposits which fill preglacial topographic depressions. Deeply incised stream valleys which formed during periods of high flow resulting from glacial meltwater are also present locally.

Most of these valleys are partially filled with alluvial material and many are occupied by streams which are orders of magnitude smaller than the ones which originally formed the valleys.

The PORTS facility is situated on one of the glacio-lacustrine deposits formed when drainage of the preglacial Teays River was obstructed and prehistoric Lake Tight was impounded. Lake Tight occupied both the main Teays River valley and many of its tributary valleys, including the Portsmouth and Newark River valleys. Fine-grained sediments accumulated within Lake Tight, forming lacustrine deposits of silt and clay as much as 50 feet thick. Figure 4 exhibits regional stratigraphic information at the PORTS facility.

Bedrock in the area consists of sedimentary strata of marine origin which were deposited during the Paleozoic Era. The formations which comprise the bedrock beneath the PORTS facility belong to the Waverly Group, and they are described below.

The Cuyahoga Formation is comprised of sandstone, conglomerate, and shale. Locally the Cuyahoga is predominantly composed of gray shale, and it is present on both the east and west side of the facility where it outcrops on the hills. The Cuyahoga formation is 250 to 300 feet thick.

The Sunbury shale is described as a hard, "bony", fissile shale. It is typically highly carbonaceous and black in color. The unit averages 20 feet in thickness throughout its known range, and it has been reported to have a maximum thickness of about 30 feet. However, the formation is highly variable, and in the vicinity of the PORTS facility the Sunbury averages only 8 to 10 feet in thickness. The Sunbury may have been removed from some areas due to erosion either before the deposition of the Lake Tight sediments (Teays formation) or in relatively recent times.

The Berea sandstone is comprised of a fine-grained sandstone interspersed with thin shale beds and laminae. The unit is gray to brown in color and 25 to 40 feet thick in the subject area. The sandstone beds range in thickness from 6 inches to 2 feet and are described as weather resistant, with "regular jointing" at

**Strike-Through Pages to Identify Changes
Renewal Permit**

SUBMISSION DATE:

SECTION B

FACILITY DESCRIPTION

B-1 GENERAL DESCRIPTION [3745-50-44(A)(1)]

This facility description section is intended to provide the permit application reviewer with a general overview of the Portsmouth Gaseous Diffusion Plant (PORTS) facility and the activities conducted at the site by the U. S. Department of Energy (DOE). The RCRA Part B Hazardous Waste Permit Application that comprises this document is for a final permit for container storage unit X-326 and is divided into Sections A through N. Documents and information required to support a particular section are provided within that section. Section A of this permit comprises the requirements of the "Part A" permit application for the X-326 hazardous waste storage unit at PORTS.

PORTS is owned by DOE and is contractor managed by ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. For the purposes of this permit application, DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC are Co-Operators of the X-326 Hazardous Waste Storage Units. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. Route 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

U.S. Department of Energy
Portsmouth/Paducah Project Office
Attention: William E. Murphie, Manager
1017 Majestic Drive, Suite 200
Lexington, KY 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Kristi Wiehle
P.O. Box 700
Piketon, OH 45661

SUBMISSION DATE:

The U.S. EPA identification number for DOE Operations at PORTS is:

OH7890008983

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio, as shown in Figure B-1. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio. Major site facilities are shown in Figure B-2. Figures B-3 through B-6 each present one-quarter of the site in greater detail with topographic contours.

PORTS began operating in 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment is accomplished by the gaseous diffusion process.

Beginning in 1993, all uranium enrichment operations at PORTS were conducted by the United States Enrichment Corporation, formed as a government-owned corporation by the Energy Policy Act of 1992, that became private in July 1998. In May 2001, USDOE placed the gaseous diffusion plant in cold standby, through a contract with USEC, to maintain the facilities for possible restart within 18–24 months in the event of a significant disruption in the nation's supply of enriched uranium. USDOE continued the plant in cold standby through September 2005 and has since transitioned the gaseous diffusion plant into cold shutdown in preparation for future decontamination and decommissioning of the facilities. USEC continues to lease the facilities under the Nuclear Regulatory authorization. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and decommissioning of excess facilities, and operation of non-leased facilities.

As a result of historical and current operations at the site, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes. Table B-1 shows the status of active hazardous waste management units at PORTS and includes the hazardous waste container storage unit X-326. A description of the X-326 is provided in the paragraphs that follow. Table B-2 provides a listing of solid waste management units at PORTS.

X-326 HAZARDOUS WASTE CONTAINER STORAGE UNITS

The X-326 Storage Units are located in the central part of the PORTS site. The X-326 Building was used for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes.

The storage areas are located on the first floor towards the south end of the building (Figure B-3). Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in Part A of this permit application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are: Areas 1, 2, 3, 4, 5, and 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors are primed and finished with an urethane-based sealant. All storage areas are surrounded

SECTION C

WASTE CHARACTERISTICS

C-1 CHEMICAL AND PHYSICAL ANALYSIS [3745-50-44(A)(2), 3745-54-13]

The Portsmouth Gaseous Diffusion Plant (PORTS) is a large, industrial, chemical processing complex that generates a variety of wastes. The Department of Energy (DOE) is responsible for environmental restoration and waste management at the site. The gaseous diffusion process buildings and related facilities were leased to United States Enrichment Corporation (USEC) on July 1, 1993. USEC is responsible for the waste generated as a result of the cold shutdown activities associated with the gaseous diffusion plant. DOE has begun decontaminating and decommissioning of inactive facilities under CERCLA. DOE will be generating waste throughout the D&D process. The X-326 container storage unit is used to store waste generated by DOE from current environmental restoration and waste management activities and waste generated prior to the lease agreement with USEC. Some USEC-generated wastes are also stored in the container storage units. Limitations on the storage of USEC Land Disposal Restriction wastes are provided by a separate Director's Finding and Orders for USEC. DOE and LATA/Parallax FLUOR-B&W Portsmouth, LLC (LPP) are not responsible for compliance with the USEC Order.

Waste managed by DOE includes a variety of closure and remediation wastes, such as excavated soils, wastewater treatment sludge, neat trichloroethylene, and decontamination and decommissioning waste.

All of the hazardous wastes generated at PORTS by DOE are currently assumed to include radioactive material from DOE operations and must be stored onsite as mixed (hazardous and radioactive) waste. Wastes determined to be mixed wastes are managed at the X-326 container storage units or shipped to a licensed facility until approved treatment and disposal methods for mixed wastes are available. If sufficient documentation is developed to demonstrate that a waste contains no added radioactive constituents, the waste will be shipped offsite to a commercial treatment, storage, disposal, or recycling facility.

The hazardous wastes generated by diffusion-related activities consist of oils, solvents, and other cleaning agents produced in decontamination and maintenance activities. These hazardous wastes are predominantly characterized on the basis of process knowledge. PORTS assumes that suspected contaminants are present until further investigation and/or analysis proves the constituents are not present or are present at concentrations below characteristic regulatory thresholds. All hazardous wastes are stored in the container storage units located within the X-326. A detailed description of these units is presented in Section D.

The following text and Table C-1 provide a brief description of each hazardous waste stream stored at PORTS. These descriptions include the following information for each waste stream: the hazardous characteristic or nature of each waste stream and the basis for characterization. The constituency and hazardous waste code designations provided represent a survey of the general nature of each waste stream. Proper storage of all wastes is ensured through the use of the waste stream review/analysis procedures provided in Section C-2.

Plant wide (PW) waste streams describe generated waste from PORTS activities. The PW waste streams are based on how the wastes are managed more than how and where the wastes were generated. For example, combustible liquids may be generated from similar processes in many PORTS buildings, but all combustible

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liquids can be managed as one waste stream. Waste treatment technologies may vary within a waste stream depending on the type and concentration of the hazardous constituents and other regulatory concerns.

The list of waste streams presented in Table C-1 includes a brief explanation of the basis for characterization for each waste stream. PORTS most commonly uses its understanding of generating processes, manufacturer's knowledge and materials used to characterize its wastes, and Table C-1 reflects this characterization. PORTS often uses Material Safety Data Sheets (MSDSs) in support of its waste characterizations based on process knowledge. PORTS conducts analysis for wastes to confirm characterization. Table C-1 indicates whether or not analysis exists and example analytical reports are presented in Appendix C-1. In addition, representative MSDSs used to support waste characterization are presented in Appendix C-2. When new/additional products are used on-site, MSDSs for these products will be maintained as part of the Hazard Communication Program. When any of these MSDSs are used to support waste characterization, the MSDS will be added to the operating record. All data supporting waste characterizations are maintained in the facility operating record for a minimum of 3 years. Records may be maintained as a hard copy or as an electronic duplicate.

DEBRIS

This waste stream is a combination of all previous debris waste streams and encompasses wastes such as equipment components, filters, masonry, personal protective equipment, rags, wipes, plastic, glassware, radioactively contaminated light bulbs, and radioactively contaminated batteries. Debris may be generated from most PORTS processes, and may be contaminated with organics and/or metal constituents (PW-201). This waste stream does not include items containing elemental mercury or labpacks, which are addressed in other PORTS waste streams. The characteristics of the debris will be determined on a case-by-case basis. The waste stream description for debris is not intended to meet the definition for debris in OAC 3745-270-02. The quantities of waste generated annually and in storage will vary.

SOIL

Soils become contaminated as a result of hazardous material spills and environmental releases, and soil waste streams are generated through spill cleanup, environmental restoration, and decontamination and decommissioning activities. Soils may be contaminated with organics and/or metal constituents (PW-202). The characteristics of the soil will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

AQUEOUS LIQUIDS

Most aqueous liquids are generated from equipment decontamination, de-watering operations, liquid spill recovery, and laboratory sample preparation and analysis. Aqueous liquids may be corrosive (D002) and contaminated with organics and/or metal constituents (PW-203). The characteristics of these liquids will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

SECTION G

RCRA HAZARDOUS WASTE CONTINGENCY PLAN [OAC 3745-50-44 (A)(7), 3745-54-50 through 56]

OVERVIEW AND PURPOSE OF PLAN

This Contingency Plan describes the actions facility personnel will take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents to air, soil, or surface water. To fulfill this purpose, the plan will be implemented immediately whenever one or more of these occurrences could threaten human health or the environment.

This document, as Section G of the Portsmouth Gaseous Diffusion Plant (PORTS) Part B Permit Application, is being provided as a stand-alone document which amends the facility's emergency plan (Portsmouth Emergency Plan) as allowed for in OAC 3745-54-52 (b) and 40 CFR 264.52 (B). While the Portsmouth Emergency Plan integrates the plant's planning processes into a single document designed to mitigate the consequences of an emergency, this Contingency Plan stands alone for response to hazardous waste incidents.

This Hazardous Waste Contingency Plan contains the following elements:

- Designation and responsibilities of personnel who are to act as emergency coordinators,
- Implementation procedures for instructions on how and when the plan will be followed,
- Descriptions of both plant internal and external alarms and notification systems,
- Assessment methods and control actions should an emergency occur,
- Location, description and capabilities of emergency equipment at the facility,
- Agreements with USEC and with local authorities and medical centers, for providing emergency management and fire protection,
- Details of evacuation plans, and
- Record keeping and incident reports

PHILOSOPHY

At PORTS, the shared philosophy on emergencies is to prepare and maintain emergency plans dedicated to principles of personnel safety, environmental protection and safe equipment operation. Consequently, the response measures provided within this plan are designed to provide maximum protection for both onsite and offsite personnel, limit damage to facilities and equipment, limit adverse impacts on the environment and minimize impacts on site operations and security. The following PORTS philosophy indicates our commitment to personnel safety and the protection of the environment.

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"The emergency philosophy of the Portsmouth Gaseous Diffusion Plant (PORTS) is to provide and maintain emergency plans that are dedicated to the following principles; in order, personal safety, environmental protection, and safe equipment operation."

Contamination control issues and environmental protection concerns are to be addressed by emergency responders following the identification, recovery and condition assessment/treatment of ill or injured personnel.

This policy shall be applied and enforced comprehensively; however, provision must be made for deviations during emergency operations -- thus allowing the Emergency Coordinator to be in a position to make decisions based upon circumstances found at the time of an emergency.

COPIES OF CONTINGENCY PLAN [OAC 3745-54-53]

Although not listed on the Part B Permit Application checklist, this section is required by the referenced regulations. A copy of the Contingency Plan and all revisions are provided to all applicable departments at PORTS. These include: custodians of hazardous waste storage units, the United States Enrichment Corporation (USEC) Emergency Preparedness Department, the USEC Fire Department, the USEC Police Department and the USEC Plant Shift Superintendent's office.

USEC, as part of an agreement to provide emergency management and fire protection service, obtains Letters of Agreement (LOAs) with offsite emergency planning and/or response organizations that have agreed to assist in the event of an emergency at PORTS. The Department of Energy (DOE)/~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC provides copies of the RCRA contingency plan to these organization as well as other interested stakeholders. This combined distribution list includes the following:

Adams County

Peebles Fire Department

Scioto Count

Southern Ohio Medical Center

Post 73, Ohio State Highway Patrol Scioto County Emergency Mgmt. Agency

Scioto County Sheriff

Scioto County Local Emergency Planning Committee

Valley Local Schools

Pike County

Pike Community Hospital

Pike County Sheriff

Pike County Emerg. Medical Service (6)

Scioto Township Volunteer Fire Dept

Beaver Volunteer Fire Department

Piketon/Seal Township Volunteer Fire Dept

Elm Grove Volunteer Fire Department

Stockdale Volunteer Fire Department

Waverly City Schools

USEC

Pike County Fire Fighters Association

Pike County Local Emerg. Ping. Com.

Ohio Division of Forestry - Pike State Forest

Waverly Fire Department

Benton Township Volunteer Fire Department

Jackson Township Volunteer Fire Department

Camp Creek Township Fire Department

Pebble Township Vol. Fire Department

Pike County Schools

Brush Creek Township Volunteer Fire Department

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Word Alive Fellowship

Franklin Township Volunteer Fire Department

Ross County

Adena Regional Medical Center Hospital

Others

Ohio Environmental Protection Agency (2)
United States Environmental Protection Agency
United States Department of Energy
Ohio Emergency Management Agency (OEMA)

AMENDMENT OF CONTINGENCY PLAN [OAC 3745-54-54]

When the Contingency Plan is revised, PORTS provides documentation to U.S. Department of Energy (DOE), and regulatory agencies, and all departments and organizations currently on the above plan distribution list. The correspondence for distribution of a revised Contingency Plan includes an offer to familiarize the receiving organization with the changes in the plan.

G-1 GENERAL INFORMATION [OAC 3745-54-52]

The container storage units at PORTS are owned by DOE and are co-operated by DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 US 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

Department of Energy
William E. Murphie, Manager
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Kristi Wiehle
P.O. Box 700
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

SUBMISSION DATE:

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC from USEC through a service agreement incorporated into the lease.

LOCATION AND SITE PLAN

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on federally-owned property. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a former Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product required the use of numerous hazardous chemicals.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

PLANNING AREA

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents. This area is the two-mile immediate notification area (INA), within a two-mile radius of the center of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Alert System Radio Station Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

No schools are located within the immediate notification area. However, county school buses frequently travel all roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

LAND USE

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

TRANSPORTATION ROUTES

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

HAZARDOUS WASTE STORAGE

The X-326 Storage Unit (See Figure G-1) is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The wastes are stored in a variety of containers, but are usually stored in DOT approved 55-gallon drums or 5-inch diameter/10-liter polyethylene bottles. Other containers as listed in Table D-2 of Section D of this application may also be used. The containers are stored on steel supports or are placed into support sleeves which are raised above the floor to prevent contact with potentially inadvertent standing liquid introduced into the area.

The X-326 Storage Unit is located in the south end on the first floor of the X-326 Process Building. Figure D-1 shows the floor plan for the X-326 Storage Unit. The X-326 Building is totally enclosed with a built-up roof, transite walls and concrete floors. Heating and cooling is provided as needed in the RCRA-permitted storage areas. The area around the building is sloped to direct run-on and run-off water to the PORTS storm sewer system.

The X-326 RCRA storage space will be used as required until final-closure is initiated.

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed out of concrete.

SUBMISSION DATE:

G-2 EMERGENCY COORDINATORS [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is ~~Darl Anderson~~ BOB NICHOLS. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the Incident Commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 IMPLEMENTATION [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

- Radio to X-300 Plant Shift Superintendent; or,
- Dial 911 on any plant phone or (740) 897-2444 on cell phones and report to answering party; or
- Pick up red emergency phone (in selected areas); or,

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possible location of the Command Post, and any areas to avoid. Any changes in the conditions at the incident scene must be passed quickly to all responders.

The Plant Shift Superintendent/Incident Commander is located in the X-300 Plant Control Facility which serves as the 24-hour point of contact for all emergency notifications. The Plant Shift Superintendent/Incident Commander:

- Provides continuous site-wide emergency direction;
 - Directs the effort to respond to an incident;
 - Assesses the incident and makes initial categorization/classification;
 - Alerts and mobilizes sufficient response forces, including technical assistance, to respond to the requirements of the emergency;
 - Directs plant or facility shutdown, if necessary, in accordance with existing plans and procedures; and
 - Ensures communications with the Emergency Operations Center (EOC), when appropriate.
- Emergency responders who routinely report to the Command Post include:
- Plant Shift Superintendent/Incident Commander
 - Response Safety Officer
 - Police Force
 - Local Emergency Director
 - Fire Department

The following organizations are called on by the Incident Commander, when necessary:

- | | |
|----------------------------|-----------------------|
| • Environmental Compliance | • Health Physics |
| • Industrial Hygiene | • Medical |
| • Nuclear Safety | • Utilities |
| • Maintenance | • Facility Operations |
| • Waste Management | |

In addition, offsite Emergency Response Organizations are available to assist the onsite Emergency Response Organization when needed.

EMERGENCY OPERATIONS CENTER

When the Emergency Operations Center becomes operational, overall command and control of the PORTS Site Emergency Response is transferred to the Crisis Manager, allowing the Incident Commander to focus on conditions and mitigation at the emergency scene. The Emergency Operations Center is located in the X-1020 Building and becomes the primary facility for coordinating onsite response and mitigation and offsite interface activities. The Emergency Operations Center is composed of an emergency information center where members of Senior Management and advisors operate, coordinate activities and communicate with onsite and offsite personnel; a Crisis Management Room (CMR) where the Crisis Management Team (CMT) is stationed to follow events and direct actions; a Technical Support Room (TSR) where the TSR Coordinator advises and directs the activities of the technical support group; a radio room where personnel monitor and transmit information; a computer room which houses the information management system; and an area where security personnel coordinate the activities of the protective force. The emergency line of executive succession for the Crisis Manager's position is shown in the next section.

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The Plant Shift Superintendent will activate the Emergency Operations Center in the event of any emergency classification: alert or site area emergency. The Emergency Operations Center may be activated at any classification level or when deemed necessary. The Plant Shift Superintendent or alternate or the Enrichment Plant Manager or alternate are authorized to activate the Emergency Operations Center. Alternate Emergency Operations Centers include the X-300 Plant Control Facility and the Mobile Communications Vehicle. Emergency Operations Center service is by an agreement between USEC and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC.

EMERGENCY LINE OF EXECUTIVE SUCCESSION

In the event of a significant emergency at PORTS, emergency executive succession of command shall be in the order listed below. If none of the management listed are available in the plant, the Plant Shift Superintendent shall assume command as well as fulfill his responsibilities as Incident Commander. The Plant Shift Superintendent will be relieved of the executive command duties by the first person to arrive as identified from the list below. PORTS does not consider those named on the list of "Emergency Line of Executive Succession" to be Emergency Coordinators. The Plant Shift Superintendent/Incident Commander continues his obligations for oversight of the emergency response.

- General Manager
- Plant Manager
- Other personnel as designated by the General Manager and trained and qualified as Crisis Manager

G-4A NOTIFICATION [OAC 3745-54-56 (A)]

This section describes the methods used for notifying PORTS Emergency Response Forces, other plant personnel and appropriate Local, State and Federal Agencies in time of an emergency.

Notification refers to required communication within mandated time frames and according to a predetermined sequence, of general information on the nature and severity of an emergency event. Notification is different from reporting because it must occur without delay for the purpose of alerting or activating, rather than informing. Notification requirements vary according to reported event level and may continue to change depending upon preliminary classification, ongoing assessments, full classification and any changes in classification.

The Plant Shift Superintendent is responsible for categorizing an event as an emergency and assigning an emergency classification. The Plant Shift Superintendent is responsible for initial notifications in accordance with Federal and State Regulations. Subsequent notifications may be the responsibility of the Plant Shift Superintendent in his role as Incident Commander or the Crisis Manager after the PORTS Emergency Operations Center becomes operational.

In any event, a prearranged format is used to ensure that the content of the notification message(s) includes the emergency classification, whether a hazardous substance and toxic chemical, hazardous waste or hazardous waste constituent, mixed waste or mixed waste constituent release is occurring or expected and identification of the response and/or protective actions taken or recommended.

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Figure G-3, Emergency Notification Form (or a similar form that meets RCRA regulatory requirements), is used for notification of an emergency. Predesignated offsite agencies are notified within 15 minutes of classification of an emergency.

PRIMARY AND ALTERNATE SYSTEMS

Primary and alternate systems are in place for notifications to the Emergency Response Organization and offsite agencies. Periodic testing is conducted according to site Emergency Preparedness Implementing Procedures.

NOTIFICATION OF ONSITE PERSONNEL

Members of the PORTS Emergency Response Organization are notified of a need to respond to an emergency by a variety of ways including automatic alarms, pagers, radios, public address system and telephones.

Plant personnel not assigned to the Emergency Response Organization receive notification of an onsite emergency condition by one of eight different alarms followed by announcements over the plant's public address system. An example of plant alarms includes a continuous sounding alarm that means for plant personnel to evacuate a building and go to their assigned assembly area. To account for all plant personnel, the accountability alarm consists of seven (7) short blasts repeated three (3) times.

NOTIFICATION OF STATE AND COUNTY GOVERNMENTS

Telephone notification is made to the Pike County 24-hour Contact Point and the Ohio Emergency Management Agency and the Ohio Environmental Protection Agency. When a site area emergency is declared, the notification to the county's 24-hour Contact Point will include a reminder that at upon the site area emergency classification, the public warning system will be activated to notify the residents in the two-mile immediate notification area (INA).

The public warning system consists of five outdoor warning sirens, tone alert radio receivers, and the Emergency Broadcast System (EBS).

NOTIFICATION OF DOE

Notification to DOE Headquarters, the Portsmouth/Paducah Project Office, and the DOE Oak Ridge Field Office is made by telephone or verbal or facsimile messages.

NOTIFICATION OF ~~LATA/PARALLAX~~ FLUOR-B&W PORTSMOUTH LLC CORPORATE PERSONNEL

Corporate personnel are notified of an emergency at PORTS by telephone or verbal or facsimile messages.

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G-4B IDENTIFICATION OF HAZARDOUS SUBSTANCES AND TOXIC CHEMICALS [OAC 3745-54-56(B)]

Upon arrival at the scene of an emergency, the Plant Shift Superintendent/Incident Commander will immediately make an assessment of the character, source, amount and extent of the release that has occurred.

In the event of a release, fire, or explosion, the identification of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents in the X-326 Waste Storage Units would be accomplished by direct observation of the leaking container or by the container inventory system maintained by the Waste Management (WM) Division.

This system maintains accountability for each container. The record for a container includes the generator data, analytical results and location in the storage unit. Because the wastes are segregated by compatibility and type, the location of the emergency may identify the material. The accountability systems are updated as frequently as necessary (often daily) to maintain an accurate container inventory.

The container inventory system is computerized with backup of data in a filing system. The data for any given container can be accessed from a computer terminal within five (5) minutes. Communications with Waste Management would be by telephone or radio. Should power be interrupted, and the computer system become inoperable, the paper back-up filing system would be used. By the location of the incident, Waste Management personnel could locate the proper files which will reveal the contents of the containers involved. A third method of identification is the collection and analysis of samples. All sampling of air, soil, water, or pooled wastes will be performed in accordance with established standards, such as SW-846, ASTM, or others. All analyses will be performed in accordance with regulatory agency approved methods, such as SW-846 or in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.

G-4C HAZARD ASSESSMENT [OAC 3745-54-56 (C)]

In the event of an emergency, the Plant Shift Superintendent/Incident Commander has at his disposal any and all personnel and resources to assist and/or advise in the assessment of the situation and its amelioration. The Plant Shift Superintendent/Incident Commander will base the assessment on all available information including process knowledge, material safety data sheets, models of air, surface water or groundwater flow patterns, and specific health based environmental criteria or limits which may be exceeded. Environmental surveillance air sample data, at a minimum, will be collected and evaluated. By utilization of this existing database and trained personnel, the Plant Shift Superintendent/Incident Commander will be able to assess both the direct and indirect effects potentially caused by the emergency. Personnel routinely available to the Plant Shift Superintendent/Incident Commander for advice and consultation include those with skills and experience in chemistry, biology, engineering, industrial hygiene, safety, regulatory compliance, process engineering and operations, health physics, medicine and other sciences. Key personnel are on call to respond to the Plant Shift Superintendent/Incident Commander at any time. If the appropriate personnel are not promptly available, the Plant Shift Superintendent/Incident Commander has been granted the authority by plant management to act on the available information and to utilize his best judgment. Existing plant emergency procedures, methods, and policies, with which the Plant Shift Superintendent/Incident Commander and the Shift Emergency Response Organization are routinely trained and exercised, provide the Plant Shift Superintendent/Incident Commander with the assistance to exercise his best judgement with confidence.

If the assessment of the emergency situation indicates that evacuation of plant personnel is required, the Plant Shift Superintendent/Incident Commander will notify the necessary personnel and area or building

G-4G INCOMPATIBLE WASTES [OAC 3745-54-56(H)(1)]

Determinations of chemical characteristics and incompatibilities by the Plant Shift Superintendent/Incident Commander can be done with visual inspections, field sampling and by knowledge of the waste origination. The analytical procedures of the waste analysis plan and the waste management and segregation procedures of the storage units and their procedures to prevent hazards are also applicable to ensuring that there will be no incompatibility problems.

G-4H POST EMERGENCY EQUIPMENT MAINTENANCE [OAC 3745-54-56(H)(2) AND (I)]

Following its use in an emergency or routine maintenance situation, all equipment is cleaned/decontaminated of hazardous substance and toxic chemical or residual excavated materials prior to being placed into storage for reuse as necessary. The purpose of the cleaning is twofold: 1) to maintain the equipment in usable condition; and 2) to prevent the spread of and/or unnecessary exposure to hazardous and/or radioactive materials.

Expendable supplies such as disposable personal protective equipment are inventoried and replaced as required as part of the decontamination activities. These decontamination activities are performed after the generated residues are containerized and sampled (as necessary) to ensure only compatible materials are stored together. The completion of the site cleanup is to include the maintenance of equipment and the replenishment of supplies, which will then be reported to the Administrator of Environmental Protection Agency (EPA) Region V, the Director of Ohio EPA and any other applicable state or local agency prior to the resumption of normal operations.

G-4I CONTAINER SPILLS AND LEAKAGE [OAC 3745-54-52(A)-(E), 3745-55-71]

Spill control equipment shall be located and available in the hazardous waste storage units at all times. Waste Management operating procedures provide detailed steps for handling and replacing leaking containers.

The general procedure that is followed is:

1. The spill or leak is contained using an inert absorbent if it can be safely done by personnel detecting the spill or leak. Once the spill or leak is safely contained, clean-up activities shall begin immediately.
2. Chemical Operations personnel, Environmental Compliance personnel, the Plant Shift Superintendent/ Incident Commander, and, if necessary, emergency response personnel are notified to provide safe clean-up guidelines and equipment.
3. The contents of the drum will be transferred to a container as specified in Table D-1 or the drum and contents will be placed in an overpack drum as stated in the procedure.

Regulatory Compliance will evaluate the occurrence against current regulations and determine the reporting requirements and, if necessary, draft appropriate notifications.

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After the emergency has been abated, the transfer of additional hazardous wastes into the storage area will be discontinued until the area is properly cleaned. There is sufficient space in other onsite storage areas to accommodate this material for several weeks.

G-4J TANK SPILLS AND LEAKAGE [OAC 3745-55-93]

PORTS is not seeking a permit for any tanks; therefore, this section does not apply.
G-4K SURFACE IMPOUNDMENT SPILLS AND LEAKAGE [OAC 3745-56-27]

PORTS is not seeking a permit for any surface impoundments; therefore, this section does not apply.

G-5 EMERGENCY EQUIPMENT [OAC 3745-54-52(E)]**FIRE EXTINGUISHING EQUIPMENT**

The closest fire department is operated by USEC. This fire department maintains a full time dedicated fire department, which includes three pumpers: 1 - with a 1500 gallons per minute (gpm) pump and 1000 gallon tank; 1 - with a 1500 gpm pump and a 500 gallon tank and 1 - with a 1200 gpm pump and a 500 gallon booster tank; 1 - mini-pumper with 300 gpm pump and a 300 gallon booster tank, and a 4-wheel drive heavy rescue vehicle, and two ambulances. The department has a truck; for carrying all types of miscellaneous emergency equipment. In addition, the department operates several pickup trucks. Each vehicle and its complement of equipment is checked at the start of each shift and a complete inventory is taken each week. This equipment and staff are housed in a modern, eight bay, brick building known as the X-1007 Fire Station. Included in the fire station is a modern, computerized alarm room.

There are two separate firewater distribution systems at PORTS. The high-pressure fire water system services all sprinkler systems and the fire hydrants in the newer areas of the plant. It has a 4-hour fire flow of 16,000 gpm at 125 pounds per square inch (psi). The low-pressure system is also known as the sanitary water system and services the fire hydrants in the older area of the plant. It has a 4-hour fire flow of 5,000 gpm at 75 psi. Fire hydrant spacing on both systems is nominally 300 feet. The fire hydrants in the area of X-326 are on the low-pressure system. The PORTS Fire Department is located in Building X-1007, about 1,000 feet from the X-326 Storage Units.

Along with the fire protection systems at PORTS, the X-326 building has a set of portable fire extinguishers available. Each unit is inspected on a routine basis. NFPA Class A, B, C or combination extinguishers can be found in most areas and are generally located 75 feet apart or approximately one for each 1250 ft² of floor space per NFPA standards. These units are to be used for small fires (e.g. waste baskets, paper on desk) only, as general personnel are not trained to fight significant fires.

EMERGENCY AND SPILL CONTROL EQUIPMENT

The container storage units have an extensive array of emergency and spill control equipment available for routine and emergency use. All equipment is maintained on a preventative maintenance schedule as recommended by the manufacturer. The list of equipment is presented as Table G-2.

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In addition to the emergency equipment, DOE/~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC has a wide variety of heavy equipment (lifting and earth moving) available for use, in an emergency, by agreement with USEC.

PERSONAL PROTECTIVE EQUIPMENT

PORTS maintains a wide variety of personal protective equipment including respiratory protection; protective clothing, including chemical-resistant encapsulating suits; and self-contained breathing apparatus. The types of respiratory protection available include organic vapor half-face, full-face and, fresh air respirators; and the aforementioned self-contained breathing apparatus. Protective clothing includes cloth coveralls, aprons, shoes, boots, various types of gloves and headgear. The chemical-resistant encapsulating suits are maintained by the USEC Fire Department Personnel who receive special training in the use, testing and inspection of such equipment.

Emergency response personal protective equipment consisting of both Level A and Level B Equipment is assigned to and is either carried on fire vehicles or is stored in the X-1007 Fire Station.

Level A Equipment consisting of positive-pressure self-contained breathing apparatus, full-encapsulating chemical resistant suits with built-in gloves, steel shank boots, a hard hat and extra gloves are carried on the fire department emergency truck. Extra positive-pressure self-contained breathing apparatus and extra air bottles are also stored on this vehicle.

Level B Equipment is worn by all responding firemen and consists of complete fire turnout gear and self-contained breathing apparatus. Additional positive-pressure self-contained breathing apparatus is available on all fire apparatus except the two ambulances. These responders normally wear white cotton gloves under their regular work gloves, and have available to them plastic booties to wear over their boots, if such protection is needed.

Tyvec coveralls, cotton gloves, skull caps, respiratory protection, plastic booties, and extra air bottles are also carried on the emergency truck. An additional supply of these items are stored in supply cabinets in the X-1007 Fire Station.

Once the situation has been stabilized by the immediate response of the fire department and the potential hazards of fire and explosion have been reduced to an acceptable level, cleanup is completed by the USEC Chemical Operations Department with the Fire Department on standby. The personal protective equipment of the chemical operators is normally Level D and occasionally Level C. The level of protection is determined by the Industrial Hygienist after determining the nature of the material spilled, taking and evaluating instrument readings for that material, and consulting with the Plant Shift Superintendent/Incident Commander, fire captain and safety personnel so that all potential hazards are considered.

INTERNAL COMMUNICATIONS AND ALARM SYSTEMS

PORTS emergency communications and alarms are established in a variety of methods. The most familiar and easily usable is the telephone. The dialing of the emergency number (911) on any plant telephone will automatically connect the caller with the USEC Fire Department. The caller will be requested to describe the nature of the emergency and location and be told to remain, if possible, at the scene until emergency personnel arrive.

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Another familiar alarm device is the fire alarm boxes located in virtually every building on plantsite. When tripped, the alarms will sound in the fire department. Personnel sounding the alarm should remain as close to the alarm box as is safely possible in order to guide emergency response personnel to the occurrence scene.

Other alarms include bells, whistles, and horns which sound in a variety of ways depending on the nature and extent of the emergency. For example, in the event of an emergency, a personnel accountability alarm may be sounded (seven rings on a bell, repeated three times) and/or, if an evacuation is necessary, a horn will sound with a continuous blast.

Emergency communications may also be accomplished by means of hand held two-way radios. A dedicated emergency frequency is assigned, and an alternate frequency may be utilized, if necessary. All personnel who may have use of a two-way radio are instructed as to its proper use.

EXTERNAL

The telephone is the primary means of external communication. Both hazardous waste storage units have telephones. The Plant Shift Superintendent, Fire Department and Police Department have radio capability to monitor and communicate directly with the area emergency responders. PORTS also has facsimile and electronic information transfer capability to communicate with those who have compatible equipment.

FIRST AID AND MEDICAL EQUIPMENT

PORTS has a doctor and nurses who can administer the full range of first aid and stabilization techniques to injured or ill personnel. The PORTS Hospital has an emergency room, examination suites and three holding beds. It is staffed on day-shift Monday through Friday excluding holidays with a physician on day-shift. The Fire Department maintains two fully equipped ambulances and most fire department personnel are certified Emergency Medical Technicians or Paramedics. These services are available through an agreement with USEC.

DECONTAMINATION EQUIPMENT

Emergency decontamination equipment for injured personnel and responder decontamination is carried on the plant emergency truck, ambulances, and fire apparatus. Additional equipment and neutralizing solutions are stored in the X-1007 Fire Station or the X-101 Hospital. This equipment generally consists of responder protective equipment, decontamination solutions, solution containment devices, and contaminated clothing storage bags.

Gross decontamination of responders is generally accomplished by using safety showers or sanitary showers in affected buildings, with decontamination solutions being stored in proper containers awaiting characterization or by decontamination with portable hoses and/or sprayers. Decontamination solutions can be collected in portable pools for proper characterization, treatment and disposal.

Heavy equipment may be decontaminated by use of water hoses, portable high pressure water or steam cleaners. Prior to this step, all gross contamination is brushed off of the affected surfaces, to limit the

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concentration in the decontamination solutions. Solutions and solids potentially contaminated with hazardous constituents are collected, sampled and properly disposed of following analytical data review.

G-6 COORDINATION AGREEMENTS [OAC 3745-54-37, 3745-54-52(C)]

An agreement with USEC provides the services of an onsite hospital, fire department, and police department. As the primary provider of emergency services to DOE/~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC, USEC obtains and is responsible for updating mutual aid agreements with several surrounding communities for joint support for emergencies at PORTS or within the communities. Copies of the mutual aid agreements and other letters of understanding with the following agencies are attached.

Mutual Aid Agreement

Piketon-Seal Township Volunteer Fire Dept	Beaver Volunteer Fire Dept
Benton Township Volunteer Fire Dept	Pebble Township Volunteer Fire Dept
Camp Creek Township Volunteer Fire Dept	Stockdale Volunteer Fire Dept
Elm Grove Volunteer Fire Dept	Waverly Fire Dept
Jackson Township Volunteer Fire Dept	Scioto Township Volunteer Fire Dept
USEC Fire Dept	Brush Creek Volunteer Fire Dept
Peebles Fire Dept	Franklin Township Volunteer Fire Dept
Pike County Fire Fighters Association (fire departments listed are part of this association)	
Ohio Division of Forestry – Pike State Forest	
Pike County Sheriff's Department	

Hospitals (LOA)

Pike County Emergency Medical Service, Waverly, Ohio
Pike Community Hospital, Waverly, Ohio
Southern Ohio Medical Center, Portsmouth, Ohio
Adena Regional Medical Center, Chillicothe, Ohio

Schools (LOA)

Pike County Schools
Valley Local Schools
Waverly City Schools, Waverly, Ohio

The remoteness of the plant from local communities would delay their emergency personnel's response time to PORTS in the event of an emergency. Therefore, USEC will be the primary emergency authority.

The Site Emergency Plan for an emergency at PORTS includes participation of county emergency forces. The plan also provides site orientation tours and classroom training biennially. The PORTS initial responders are intimately familiar with the facility and will have assessed the hazards and support needs prior to the arrival of offsite aid. For these reasons, PORTS will have the lead on any onsite emergency response and all of the offsite aid will be supportive in nature. PORTS will direct the offsite support units so that all parties will understand their responsibilities.

In order to provide additional medical support for employees, contractors and visitors, USEC maintains Letters of Agreement (LOA) with three area hospitals. These letters indicate that the hospitals will accept PORTS patients for treatment. Additional emergency medical services are provided by a LOA with the county emergency medical service.

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PORTS has designated and equipped a Joint Public Information Center (JPIC) to provide a single facility from which multi-organizational emergency public information can be coordinated and disseminated during emergencies at the plant which involve, or could involve, offsite emergency actions to protect the public.

The facility for the Joint Public Information Center is the Word Alive Fellowship facilities. Agreements are in place to support this effort. Agreements are in place to support this effort. These agreements, Letters of Understanding, and copies of fire mutual aid agreements are provided in Attachment G.1.

Due to the security required, special circumstances of the operations at this facility, and the possible nuclear contamination involved with any emergency at PORTS, it is assumed that outside contractors and Ohio EPA Response Teams will not be required to respond to emergencies occurring here. No agreements have been solicited from either contractors or Ohio EPA for this reason. Should Ohio EPA choose to attend drills or training sessions with local mutual aid organizations, arrangements can be made for their inclusion.

G-7 EVACUATION PLAN [OAC 3745-54-52(F)]

The Emergency Evacuation Organization for each building onsite will consist of a Local Emergency Director (LED) and as many assistant local emergency directors and/or Building Wardens as may be deemed necessary. Normally, the local emergency director will be the supervisor in charge of the area requiring evacuation. The number of personnel in the evacuation organization may be varied at the direction of the local emergency director or Plant Shift Superintendent/Incident Commander according to the following:

- a. Size of building;
- b. Number of employees and presence of physically impaired employees;
- c. Type and location of exit doors;
- d. Emergencies requiring evacuation shall include, as a minimum:
 1. Explosions, fires, spills or releases of a volume of hazardous waste or hazardous waste constituent, mixed waste or mixed waste constituent sufficient to threaten human health in the vicinity,
 2. Releases causing concentrations in the air to exceed the Threshold Limit Value (TLV) concentration, and
 3. Releases for which a rapid determination of contaminant concentrations cannot be made.

EVACUATION CRITERIA

The authority for determining the necessity and scope of an evacuation is vested in the local emergency director who is on the scene. The Plant Shift Superintendent/Incident Commander may expand the scope of the evacuation. There are a number of specific events that require evacuation such as fires, release of process or toxic gas, explosions, pressure ruptures, and large spills. In any real or potential emergency, the local emergency directors and the Plant Shift Superintendent/Incident Commander are to take the necessary actions to protect human life and provide for their safety and health.

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Persons evacuating from these Emergency Egress Roto Gates will proceed south on Pike Avenue, turn right and proceed east on 11th Street and assemble at the X-106, Monitoring Station #2.

Exit Points - Pike Avenue - Roto Gate

Evacuation Routes:

Primary

Persons evacuating from Emergency Egress Roto Gate Pedestrian Gate-7 will proceed north on Pike Avenue, persons evacuating from Emergency Egress Roto Gates will proceed south on Pike Avenue. They will then proceed east on 11th Street and assemble at the X-106, Monitoring Station #2.

Alternate

Persons evacuating from these Emergency Egress Roto Gates will proceed south on Pike Avenue, turn left and proceed east on 10th Street, turn right and proceed south on Mahoning Avenue, turn left and proceed east on 7th Street and assemble at the X-109C, Monitoring Station #1.

G-8 REQUIRED REPORTS [OAC 3745-54-56(J)]

Within 15 days of the incident, PORTS will provide a written report on the occurrence to the Region V Administrator and the Director of Ohio Environmental Protection Agency through DOE. Copies will be included in the operating record. The report will include at a minimum:

1. Name, address and telephone number of the owner or operator;
2. Name, address and telephone number of the facility;
3. Date, time and type of incident (e.g. fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of the actual or potential hazards to human health or the environment, Where applicable;
7. Estimated quantity and disposition of recovered material that resulted from the occurrence;
8. Any other information as the director may require.

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**TABLE G-1 PORTSMOUTH GASEOUS DIFFUSION PLANT EMERGENCY COORDINATORS
(PLANT SHIFT SUPERINTENDENTS)**

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Darl Anderson BOB NICHOLS	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

ATTACHMENT J.1

1999 DIRECTOR'S FINAL FINDINGS AND ORDERS

~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is not a party to the 1999 Director's Final Findings and Orders. With respect to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's obligation to perform work under the 1999 Director's Final Findings and Orders, this obligation arises from ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's contract with DOE. Consequently, any obligations under the 1999 Director's Final Findings and Orders that ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC may have through contract with DOE terminate when ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is no longer responsible under contract.

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ATTACHMENT J.2

1989 CONSENT DECREE

~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is not a party to the 1989 Consent Decree. With respect to ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's obligation to perform work under the 1989 Consent Decree, this obligation arises from ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC's contract with DOE. Consequently any obligations under the 1989 Consent Decree that ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC is no longer responsible under contract.

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SECTION N CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy

Owner and Operator

Site Manager

Date Signed

~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC

Co-Operator

BY:

~~Project~~ PROGRAM Manager

Date Signed

The Department of Energy has signed this application for the permitted facility as owner and operator and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC has signed as co-operator. The Department has determined that dual signatures best reflect the actual apportionment of responsibility under which the Department's RCRA responsibilities are for policy, programmatic, funding and scheduling decisions, as well as general oversight; and, the contractor's RCRA responsibilities for day-to-day operations, (in accordance with general directions given by DOE as part of its general oversight responsibility), including but not limited to, the following responsibilities: waste analysis and handling, monitoring, record keeping, reporting, and contingency planning. For purposes of the certification required by OAC 3745-50-42(D), the DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC representatives certify, to the best of their knowledge and belief, the truth, accuracy and completeness of the application for their respective areas of responsibility.

SUBMISSION DATE:

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SUBMISSION DATE:

**CLOSURE PLAN FOR THE X-326 UNIT
PORTSMOUTH GASEOUS DIFFUSION PLANT**

Date Issued —

**Prepared for the
U.S. Department of Energy
Office of Environmental Restoration and Waste Management**

**~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC
Managing the
DECONTAMINATION AND DECOMMISSIONING AND
Environmental Remediation Activities at the
Portsmouth Gaseous Diffusion Plant
under contract DE-AC30-10CC40017
for the
U.S. DEPARTMENT OF ENERGY**

SUBMISSION DATE:

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1. FACILITY DESCRIPTION

1.1 GENERAL DESCRIPTION

The Portsmouth Gaseous Diffusion Plant (PORTS) is owned by United States Department of Energy (DOE) and is contractor managed by ~~LATA/Parallax~~ FLUOR-B&W Portsmouth LLC. For the purposes of this permit application, DOE and ~~LATA/Parallax~~ FLUOR-B&W Portsmouth, LLC are Co-Operators of the X-326 Hazardous Waste Storage Units.

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio (see Figure 1).

PORTS has operated since 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment was accomplished by the gaseous diffusion process. As of 1993, all uranium enrichment operations at PORTS are conducted by the United States Enrichment Corporation (USEC), formed as a government-owned corporation by the Energy Policy Act of 1992 that became private in July 1998. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and demolition activities, and operation of nonleased facilities.

As a result of historical enrichment operations, which is typical of large industrial plants, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes.

The X-326 Storage Unit is located in the central part of the PORTS site (see Figure 2). The X-326 Building was in use from 1956 through 2001 for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes. The storage areas are located on the first floor towards the south end of the building (see Figure 3).

The X-326 Storage Unit is intended for the storage of high assay uranium bearing hazardous wastes until further uranium classification, or off-site shipment for recovery, treatment, or disposal is completed. Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in the Part A Permit Application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the East Cage and the West Cage). Storage area floors are primed and finished with a urethane-based sealant. All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed of concrete.

1.1.1 TOPOGRAPHIC MAP

The U.S. Geological Survey (USGS) topographic map for the facility is shown in Section B, Figure B-2. Topographic details of the X-326 Storage Unit area are shown on Figure 3.

SUBMISSION DATE:

1.2 HYDROGEOLOGIC INFORMATION

1.2.1 GEOLOGIC AND HYDROLOGIC SETTINGS

The PORTS facility lies near the western margin of the Appalachian Highlands within the Appalachian Plateau Province. The physiography of this area is typified by rugged, irregularly dissected hills and ridges separated by generally mature drainage systems. The topographic highs are erosional remnants of the more competent units of the Paleozoic bedrock which underlie the area.

The facility lies to the south of the terminus of Pleistocene glaciation, however, two distinct physiographic features of glacial origin are present in the area. The most prominent of these features are large flat expanses of glacio-lacustrine deposits which fill preglacial topographic depressions. Deeply incised stream valleys which formed during periods of high flow resulting from glacial meltwater are also present locally.

Most of these valleys are partially filled with alluvial material and many are occupied by streams which are orders of magnitude smaller than the ones which originally formed the valleys.

The PORTS facility is situated on one of the glacio-lacustrine deposits formed when drainage of the preglacial Teays River was obstructed and prehistoric Lake Tight was impounded. Lake Tight occupied both the main Teays River valley and many of its tributary valleys, including the Portsmouth and Newark River valleys. Fine-grained sediments accumulated within Lake Tight, forming lacustrine deposits of silt and clay as much as 50 feet thick. Figure 4 exhibits regional stratigraphic information at the PORTS facility.


Bedrock in the area consists of sedimentary strata of marine origin which were deposited during the Paleozoic Era. The formations which comprise the bedrock beneath the PORTS facility belong to the Waverly Group, and they are described below.

The Cuyahoga Formation is comprised of sandstone, conglomerate, and shale. Locally the Cuyahoga is predominantly composed of gray shale, and it is present on both the east and west side of the facility where it outcrops on the hills. The Cuyahoga formation is 250 to 300 feet thick.

The Sunbury shale is described as a hard, "bony", fissile shale. It is typically highly carbonaceous and black in color. The unit averages 20 feet in thickness throughout its known range, and it has been reported to have a maximum thickness of about 30 feet. However, the formation is highly variable, and in the vicinity of the PORTS facility the Sunbury averages only 8 to 10 feet in thickness. The Sunbury may have been removed from some areas due to erosion either before the deposition of the Lake Tight sediments (Teays formation) or in relatively recent times.

The Berea sandstone is comprised of a fine-grained sandstone interspersed with thin shale beds and laminae. The unit is gray to brown in color and 25 to 40 feet thick in the subject area. The sandstone beds range in thickness from 6 inches to 2 feet and are described as weather resistant, with "regular jointing" at right angles to bedding surfaces. In Pike County the uppermost 6 to 10 feet of the unit is reported to be massive with few bedding planes or shale laminae. Below this upper unit a 20 to 35 foot thick blue and gray sandstone interbedded with shale is present. This unit is reported to increase in shale content downsection so that it exhibits a gradational contact with the underlying Bedford shale.

**Clean-Copy Replacement Pages
Renewal Permit**

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup <u>in one or more months</u> of the report year (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number <u>O H 7 8 9 0 0 0 8 9 8 3</u>		
3. Site Name	Name: Portsmouth Gaseous Diffusion Plant		
4. Site Location Information	Street Address: 3930 U.S. Route 23 South		
	City, Town, or Village: Piketon		County: Pike
	State: Ohio	Country: United States	Zip Code: 45661
5. Site Land Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. <u>5 6 2 2 1 1</u>		C. <u> </u>
	B. <u> </u>		D. <u> </u>
7. Site Mailing Address	Street or P.O. Box: P.O. Box 700		
	City, Town, or Village: Piketon		
	State: Ohio	Country: United States	Zip Code: 45661-0700
8. Site Contact Person	First Name: William		MI: E. Last: Murphie
	Title: Manager, Portsmouth/Paducah Project Office		
	Street or P.O. Box: 1017 Majestic Drive, Suite 200		
	City, Town or Village: Lexington		
	State: Kentucky	Country: United States	Zip Code: 40513
	Email: william.murphie@lex.doe.gov		
	Phone: (859) 219-4000	Ext.:	Fax:
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: U.S. Department of Energy		Date Became Owner: 01/14/1955
	Owner Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input checked="" type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 1017 Majestic Drive, Suite 200		
	City, Town, or Village: Lexington		Phone: (859) 219-4000
	State: Kentucky	Country: United States	Zip Code: 40513
	B. Name of Site's Operator: Fluor-B&W Portsmouth, LLC		Date Became Operator: 01/17/2011
	Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input checked="" type="checkbox"/> Other		

EPA ID Number 0 H 7 8 9 0 0 0 8 9 8 3

OMB#: 2050-0024; Expires 11/30/2011

10. Type of Regulated Waste Activity (at your site)Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.**A. Hazardous Waste Activities; Complete all parts 1-7.**Y ☒ N ☐**1. Generator of Hazardous Waste**

If "Yes", mark only one of the following – a, b, or c.

- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

Y ☐ N ☒

d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.

Y ☐ N ☒

e. United States Importer of Hazardous Waste

Y ☒ N ☐

f. Mixed Waste (hazardous and radioactive) Generator

Y ☐ N ☒**2. Transporter of Hazardous Waste**

If "Yes", mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☒ N ☐**3. Treater, Storer, or Disposer of Hazardous Waste**

Note: A hazardous waste permit is required for these activities.

Y ☐ N ☒**4. Recycler of Hazardous Waste**Y ☐ N ☒**5. Exempt Boiler and/or Industrial Furnace**

If "Yes", mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒**6. Underground Injection Control**Y ☐ N ☒**7. Receives Hazardous Waste from Off-site****B. Universal Waste Activities; Complete all parts 1-2.**Y ☒ N ☐

1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.

- a. Batteries ☒
- b. Pesticides ☐
- c. Mercury containing equipment ☒
- d. Lamps ☒
- e. Other (specify) Hg Thermostats ☒
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☒**2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.Y ☐ N ☒**1. Used Oil Transporter**

If "Yes", mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☒**2. Used Oil Processor and/or Re-refiner**

If "Yes", mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒**3. Off-Specification Used Oil Burner**Y ☐ N ☒**4. Used Oil Fuel Marketer**

If "Yes", mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number 0 H 7 8 9 0 0 0 8 9 8 3

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3. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D018	D006
D019	D020	D021	D022	D007	D023	D024
D025	D026	D016	D027	D028	D029	D030
D012	D031	D032	D033	D034	D008	D013
D009	D014	D035	D036	D037	D038	D010
D011	D039	D015	D040	D041	D042	D017
D043	D-XXX	F001	F002	F003	F004	F005
F006	F007	F027	F-XXX	K-XXX	P023	P058
P003	P070	P004	P005	P008	P119	P099

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

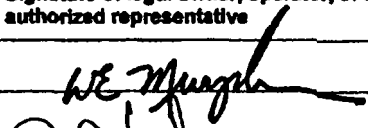
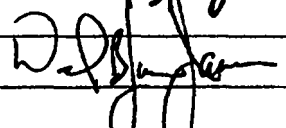
SUBMISSION DATE: **OCT 15 2010**EPA ID Number **OH7890008983**

OMB#: 2050-0024; Expires 11/30/2011

12. Notification of Hazardous Secondary Material (HSM) ActivityY ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.**13. Comments**

9.B) Operator Type is Federal Government Contractor; 11.A) (continued) P010,P012, P038, P011, P013, P024, P077, P028, P042, P046, P001, P015, P018, P021, P022, P095, P029, P030, P031, P033, P016, P037, P041, P060, P051, P047, P048, P020, P111, P050, P056, P059, P116, P068, P063, P082, P064, P071, P072, P073, P074, P075, P076, P078, P087, P089, P093, P110, P098, P114, P104, P105, P106, P108, P115, P113, P123, P120, P121, P-XXX, U001, U034, U240, U112, U144, U214, U002, U003, U004, U006, U007, U008, U009, U012, U017, U018, U094, U328, U353, U222, U019, U030, U037, U028, U069, U088, U102, U107, U070, U071, U072, U060, U223, U239, U201, U127, U056, U220, U105, U106, U055, U246, U169, U183, U185, U020, U207, U061, U247, U023, U234, U021, U202, U141, U064, U248, U022, U107, U073, U225, U128, U031, U159, U160, U074, U032, U211, U036, U039, U042, U044, U046, U047, U048, U050, U051, U052, U129, U057, U130, U063, U066, U075, U078, U079, U081, U082, U084, U108, U086, U092, U096, U101, U109, U110, U041, U067, U076, U077, U131, U117, U184, U208, U209, U218, U226, U227, U043, U210, U228, U113, U238, U359, U118, U120, U122, U123, U147, U213, U126, U243, U133, U134, U135, U137, U190, U140, U142, U146, U145, U149, U150, U151, U152, U029, U045, U068, U080, U138, U153, U121, U154, U161, U162, U167, U165, U236, U217, U170, U171, U182, U188, U191, U235, U083, U196, U204, U205, U216, U219, AND U-XXX.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	William E. Murphie, Manager,	10/15/2010
	Portsmouth/Paducah Project Office	
	Woodrow B. "Jamie" Jameson, Prg Mgr	10/15/10
	Fluor-B&W Portsmouth, LLC	

OCT 15 2010**SECTION B****FACILITY DESCRIPTION****B-1 GENERAL DESCRIPTION [3745-50-44(A)(1)]**

This facility description section is intended to provide the permit application reviewer with a general overview of the Portsmouth Gaseous Diffusion Plant (PORTS) facility and the activities conducted at the site by the U. S. Department of Energy (DOE). The RCRA Part B Hazardous Waste Permit Application that comprises this document is for a final permit for container storage unit X-326 and is divided into Sections A through N. Documents and information required to support a particular section are provided within that section. Section A of this permit comprises the requirements of the "Part A" permit application for the X-326 hazardous waste storage unit at PORTS.

PORTS is owned by DOE and is contractor managed by Fluor-B&W Portsmouth LLC. For the purposes of this permit application, DOE and Fluor-B&W Portsmouth LLC are Co-Operators of the X-326 Hazardous Waste Storage Units. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. Route 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

U.S. Department of Energy
Portsmouth/Paducah Project Office
Attention: William E. Murphie, Manager
1017 Majestic Drive, Suite 200
Lexington, KY 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Kristi Wiehle
P.O. Box 700
Piketon, OH 45661

SUBMISSION DATE: SEP 13 2010

The U.S. EPA identification number for DOE Operations at PORTS is:

OH7890008983

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio, as shown in Figure B-1. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio. Major site facilities are shown in Figure B-2. Figures B-3 through B-6 each present one-quarter of the site in greater detail with topographic contours.

PORTS began operating in 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment is accomplished by the gaseous diffusion process.

Beginning in 1993, all uranium enrichment operations at PORTS were conducted by the United States Enrichment Corporation, formed as a government-owned corporation by the Energy Policy Act of 1992, that became private in July 1998. In May 2001, USDOE placed the gaseous diffusion plant in cold standby, through a contract with USEC, to maintain the facilities for possible restart within 18–24 months in the event of a significant disruption in the nation's supply of enriched uranium. USDOE continued the plant in cold standby through September 2005 and has since transitioned the gaseous diffusion plant into cold shutdown in preparation for future decontamination and decommissioning of the facilities. USEC continues to lease the facilities under the Nuclear Regulatory authorization. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and decommissioning of excess facilities, and operation of non-leased facilities.

As a result of historical and current operations at the site, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes. Table B-1 shows the status of active hazardous waste management units at PORTS and includes the hazardous waste container storage unit X-326. A description of the X-326 is provided in the paragraphs that follow. Table B-2 provides a listing of solid waste management units at PORTS.

X-326 HAZARDOUS WASTE CONTAINER STORAGE UNITS

The X-326 Storage Units are located in the central part of the PORTS site. The X-326 Building was used for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes.

The storage areas are located on the first floor towards the south end of the building (Figure B-3). Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in Part A of this permit application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are: Areas 1, 2, 3, 4, 5, and 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors are primed and finished with an urethane-based sealant. All storage areas are surrounded

OCT 15 2010

SECTION C

WASTE CHARACTERISTICS

C-1 CHEMICAL AND PHYSICAL ANALYSIS [3745-50-44(A)(2), 3745-54-13]

The Portsmouth Gaseous Diffusion Plant (PORTS) is a large, industrial, chemical processing complex that generates a variety of wastes. The Department of Energy (DOE) is responsible for environmental restoration and waste management at the site. The gaseous diffusion process buildings and related facilities were leased to United States Enrichment Corporation (USEC) on July 1, 1993. USEC is responsible for the waste generated as a result of the cold shutdown activities associated with the gaseous diffusion plant. DOE has begun decontaminating and decommissioning of inactive facilities under CERCLA. DOE will be generating waste throughout the D&D process. The X-326 container storage unit is used to store waste generated by DOE from current environmental restoration and waste management activities and waste generated prior to the lease agreement with USEC. Some USEC-generated wastes are also stored in the container storage units. Limitations on the storage of USEC Land Disposal Restriction wastes are provided by a separate Director's Finding and Orders for USEC. DOE and Fluor-B&W Portsmouth, LLC are not responsible for compliance with the USEC Order.

Waste managed by DOE includes a variety of closure and remediation wastes, such as excavated soils, wastewater treatment sludge, neat trichloroethylene, and decontamination and decommissioning waste.

All of the hazardous wastes generated at PORTS by DOE are currently assumed to include radioactive material from DOE operations and must be stored onsite as mixed (hazardous and radioactive) waste. Wastes determined to be mixed wastes are managed at the X-326 container storage units or shipped to a licensed facility until approved treatment and disposal methods for mixed wastes are available. If sufficient documentation is developed to demonstrate that a waste contains no added radioactive constituents, the waste will be shipped offsite to a commercial treatment, storage, disposal, or recycling facility.

The hazardous wastes generated by diffusion-related activities consist of oils, solvents, and other cleaning agents produced in decontamination and maintenance activities. These hazardous wastes are predominantly characterized on the basis of process knowledge. PORTS assumes that suspected contaminants are present until further investigation and/or analysis proves the constituents are not present or are present at concentrations below characteristic regulatory thresholds. All hazardous wastes are stored in the container storage units located within the X-326. A detailed description of these units is presented in Section D.

The following text and Table C-1 provide a brief description of each hazardous waste stream stored at PORTS. These descriptions include the following information for each waste stream: the hazardous characteristic or nature of each waste stream and the basis for characterization. The constituency and hazardous waste code designations provided represent a survey of the general nature of each waste stream. Proper storage of all wastes is ensured through the use of the waste stream review/analysis procedures provided in Section C-2.

Plant wide (PW) waste streams describe generated waste from PORTS activities. The PW waste streams are based on how the wastes are managed more than how and where the wastes were generated. For example, combustible liquids may be generated from similar processes in many PORTS buildings, but all combustible

SUBMISSION DATE: SEP 13 2010

liquids can be managed as one waste stream. Waste treatment technologies may vary within a waste stream depending on the type and concentration of the hazardous constituents and other regulatory concerns.

The list of waste streams presented in Table C-1 includes a brief explanation of the basis for characterization for each waste stream. PORTS most commonly uses its understanding of generating processes, manufacturer's knowledge and materials used to characterize its wastes, and Table C-1 reflects this characterization. PORTS often uses Material Safety Data Sheets (MSDSs) in support of its waste characterizations based on process knowledge. PORTS conducts analysis for wastes to confirm characterization. Table C-1 indicates whether or not analysis exists and example analytical reports are presented in Appendix C-1. In addition, representative MSDSs used to support waste characterization are presented in Appendix C-2. When new/additional products are used on-site, MSDSs for these products will be maintained as part of the Hazard Communication Program. When any of these MSDSs are used to support waste characterization, the MSDS will be added to the operating record. All data supporting waste characterizations are maintained in the facility operating record for a minimum of 3 years. Records may be maintained as a hard copy or as an electronic duplicate.

DEBRIS

This waste stream is a combination of all previous debris waste streams and encompasses wastes such as equipment components, filters, masonry, personal protective equipment, rags, wipes, plastic, glassware, radioactively contaminated light bulbs, and radioactively contaminated batteries. Debris may be generated from most PORTS processes, and may be contaminated with organics and/or metal constituents (PW-201). This waste stream does not include items containing elemental mercury or labpacks, which are addressed in other PORTS waste streams. The characteristics of the debris will be determined on a case-by-case basis. The waste stream description for debris is not intended to meet the definition for debris in OAC 3745-270-02. The quantities of waste generated annually and in storage will vary.

SOIL

Soils become contaminated as a result of hazardous material spills and environmental releases, and soil waste streams are generated through spill cleanup, environmental restoration, and decontamination and decommissioning activities. Soils may be contaminated with organics and/or metal constituents (PW-202). The characteristics of the soil will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

AQUEOUS LIQUIDS

Most aqueous liquids are generated from equipment decontamination, de-watering operations, liquid spill recovery, and laboratory sample preparation and analysis. Aqueous liquids may be corrosive (D002) and contaminated with organics and/or metal constituents (PW-203). The characteristics of these liquids will be determined on a case-by-case basis. The quantities of waste generated annually and in storage will vary.

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SECTION G

RCRA HAZARDOUS WASTE CONTINGENCY PLAN [OAC 3745-50-44 (A)(7), 3745-54-50 through 56]

OVERVIEW AND PURPOSE OF PLAN

This Contingency Plan describes the actions facility personnel will take in response to fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents to air, soil, or surface water. To fulfill this purpose, the plan will be implemented immediately whenever one or more of these occurrences could threaten human health or the environment.

This document, as Section G of the Portsmouth Gaseous Diffusion Plant (PORTS) Part B Permit Application, is being provided as a stand-alone document which amends the facility's emergency plan (Portsmouth Emergency Plan) as allowed for in OAC 3745-54-52 (b) and 40 CFR 264.52 (B). While the Portsmouth Emergency Plan integrates the plant's planning processes into a single document designed to mitigate the consequences of an emergency, this Contingency Plan stands alone for response to hazardous waste incidents.

This Hazardous Waste Contingency Plan contains the following elements:

- Designation and responsibilities of personnel who are to act as emergency coordinators,
- Implementation procedures for instructions on how and when the plan will be followed,
- Descriptions of both plant internal and external alarms and notification systems,
- Assessment methods and control actions should an emergency occur,
- Location, description and capabilities of emergency equipment at the facility,
- Agreements with USEC and with local authorities and medical centers, for providing emergency management and fire protection,
- Details of evacuation plans, and
- Record keeping and incident reports

PHILOSOPHY

At PORTS, the shared philosophy on emergencies is to prepare and maintain emergency plans dedicated to principles of personnel safety, environmental protection and safe equipment operation. Consequently, the response measures provided within this plan are designed to provide maximum protection for both onsite and offsite personnel, limit damage to facilities and equipment, limit adverse impacts on the environment and minimize impacts on site operations and security. The following PORTS philosophy indicates our commitment to personnel safety and the protection of the environment.

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"The emergency philosophy of the Portsmouth Gaseous Diffusion Plant (PORTS) is to provide and maintain emergency plans that are dedicated to the following principles; in order, personal safety, environmental protection, and safe equipment operation."

Contamination control issues and environmental protection concerns are to be addressed by emergency responders following the identification, recovery and condition assessment/treatment of ill or injured personnel.

This policy shall be applied and enforced comprehensively; however, provision must be made for deviations during emergency operations – thus allowing the Emergency Coordinator to be in a position to make decisions based upon circumstances found at the time of an emergency.

COPIES OF CONTINGENCY PLAN [OAC 3745-54-53]

Although not listed on the Part B Permit Application checklist, this section is required by the referenced regulations. A copy of the Contingency Plan and all revisions are provided to all applicable departments at PORTS. These include: custodians of hazardous waste storage units, the United States Enrichment Corporation (USEC) Emergency Preparedness Department, the USEC Fire Department, the USEC Police Department and the USEC Plant Shift Superintendent's office.

USEC, as part of an agreement to provide emergency management and fire protection service, obtains Letters of Agreement (LOAs) with offsite emergency planning and/or response organizations that have agreed to assist in the event of an emergency at PORTS. The Department of Energy (DOE)/Fluor-B&W Portsmouth LLC provides copies of the RCRA contingency plan to these organization as well as other interested stakeholders. This combined distribution list includes the following:

Adams County

Peebles Fire Department

Scioto Count

Southern Ohio Medical Center

Post 73, Ohio State Highway Patrol Scioto County Emergency Mgmt. Agency

Scioto County Sheriff

Scioto County Local Emergency Planning Committee

Valley Local Schools

Pike County

Pike Community Hospital

Pike County Sheriff

Pike County Emerg. Medical Service (6)

Scioto Township Volunteer Fire Dept

Beaver Volunteer Fire Department

Piketon/Seal Township Volunteer Fire Dept

Elm Grove Volunteer Fire Department

Stockdale Volunteer Fire Department

Waverly City Schools

USEC

Pike County Fire Fighters Association

Pike County Local Emerg. Plng. Com.

Ohio Division of Forestry - Pike State Forest

Waverly Fire Department

Benton Township Volunteer Fire Department

Jackson Township Volunteer Fire Department

Camp Creek Township Fire Department

Pebble Township Vol. Fire Department

Pike County Schools

Brush Creek Township Volunteer Fire Department

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Word Alive Fellowship

Franklin Township Volunteer Fire Department

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Ross County

Adena Regional Medical Center Hospital

Others

Ohio Environmental Protection Agency (2)

United States Environmental Protection Agency

United States Department of Energy

Ohio Emergency Management Agency (OEMA)

AMENDMENT OF CONTINGENCY PLAN [OAC 3745-54-54]

When the Contingency Plan is revised, PORTS provides documentation to U.S. Department of Energy (DOE), and regulatory agencies, and all departments and organizations currently on the above plan distribution list. The correspondence for distribution of a revised Contingency Plan includes an offer to familiarize the receiving organization with the changes in the plan.

G-1 GENERAL INFORMATION [OAC 3745-54-52]

The container storage units at PORTS are owned by DOE and are co-operated by DOE and Fluor-B&W Portsmouth LLC. The address for the facility is:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 US 23 South
Piketon, OH 45661

The mailing address for all correspondence is:

Department of Energy
William E. Murphie, Manager
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

The primary contact for hazardous waste storage activities at PORTS is:

U.S. Department of Energy
Attention: Kristi Wiehle
P.O. Box 700
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

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The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to Fluor-B&W Portsmouth LLC from USEC through a service agreement incorporated into the lease.

LOCATION AND SITE PLAN

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on federally-owned property. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a former Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product required the use of numerous hazardous chemicals.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

PLANNING AREA

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents. This area is the two-mile immediate notification area (INA), within a two-mile radius of the center of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Alert System Radio Station Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

No schools are located within the immediate notification area. However, county school buses frequently travel all roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

LAND USE

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

TRANSPORTATION ROUTES

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

HAZARDOUS WASTE STORAGE

The X-326 Storage Unit (See Figure G-1) is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The wastes are stored in a variety of containers, but are usually stored in DOT approved 55-gallon drums or 5-inch diameter/10-liter polyethylene bottles. Other containers as listed in Table D-2 of Section D of this application may also be used. The containers are stored on steel supports or are placed into support sleeves which are raised above the floor to prevent contact with potentially inadvertent standing liquid introduced into the area.

The X-326 Storage Unit is located in the south end on the first floor of the X-326 Process Building. Figure D-1 shows the floor plan for the X-326 Storage Unit. The X-326 Building is totally enclosed with a built-up roof, transite walls and concrete floors. Heating and cooling is provided as needed in the RCRA-permitted storage areas. The area around the building is sloped to direct run-on and run-off water to the PORTS storm sewer system.

The X-326 RCRA storage space will be used as required until final-closure is initiated.

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed out of concrete.

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G-2 EMERGENCY COORDINATORS [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is Danny Nichols. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between Fluor-B&W Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the Incident Commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 IMPLEMENTATION [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

- Radio to X-300 Plant Shift Superintendent; or,
- Dial 911 on any plant phone or (740) 897-2444 on cell phones and report to answering party; or
- Pick up red emergency phone (in selected areas); or,

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possible location of the Command Post, and any areas to avoid. Any changes in the conditions at the incident scene must be passed quickly to all responders.

The Plant Shift Superintendent/Incident Commander is located in the X-300 Plant Control Facility which serves as the 24-hour point of contact for all emergency notifications. The Plant Shift Superintendent/Incident Commander:

- Provides continuous site-wide emergency direction;
- Directs the effort to respond to an incident;
- Assesses the incident and makes initial categorization/classification;
- Alerts and mobilizes sufficient response forces, including technical assistance, to respond to the requirements of the emergency;
- Directs plant or facility shutdown, if necessary, in accordance with existing plans and procedures; and
- Ensures communications with the Emergency Operations Center (EOC), when appropriate.
- Emergency responders who routinely report to the Command Post include:
- Plant Shift Superintendent/Incident Commander
- Response Safety Officer
- Police Force
- Local Emergency Director
- Fire Department

The following organizations are called on by the Incident Commander, when necessary:

- | | |
|----------------------------|-----------------------|
| • Environmental Compliance | • Health Physics |
| • Industrial Hygiene | • Medical |
| • Nuclear Safety | • Utilities |
| • Maintenance | • Facility Operations |
| • Waste Management | |

In addition, offsite Emergency Response Organizations are available to assist the onsite Emergency Response Organization when needed.

EMERGENCY OPERATIONS CENTER

When the Emergency Operations Center becomes operational, overall command and control of the PORTS Site Emergency Response is transferred to the Crisis Manager, allowing the Incident Commander to focus on conditions and mitigation at the emergency scene. The Emergency Operations Center is located in the X-1020 Building and becomes the primary facility for coordinating onsite response and mitigation and offsite interface activities. The Emergency Operations Center is composed of an emergency information center where members of Senior Management and advisors operate, coordinate activities and communicate with onsite and offsite personnel; a Crisis Management Room (CMR) where the Crisis Management Team (CMT) is stationed to follow events and direct actions; a Technical Support Room (TSR) where the TSR Coordinator advises and directs the activities of the technical support group; a radio room where personnel monitor and transmit information; a computer room which houses the information management system; and an area where security personnel coordinate the activities of the protective force. The emergency line of executive succession for the Crisis Manager's position is shown in the next section.

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The Plant Shift Superintendent will activate the Emergency Operations Center in the event of any emergency classification: alert or site area emergency. The Emergency Operations Center may be activated at any classification level or when deemed necessary. The Plant Shift Superintendent or alternate or the Enrichment Plant Manager or alternate are authorized to activate the Emergency Operations Center. Alternate Emergency Operations Centers include the X-300 Plant Control Facility and the Mobile Communications Vehicle. Emergency Operations Center service is by an agreement between USEC and Fluor-B&W Portsmouth LLC.

EMERGENCY LINE OF EXECUTIVE SUCCESSION

In the event of a significant emergency at PORTS, emergency executive succession of command shall be in the order listed below. If none of the management listed are available in the plant, the Plant Shift Superintendent shall assume command as well as fulfill his responsibilities as Incident Commander. The Plant Shift Superintendent will be relieved of the executive command duties by the first person to arrive as identified from the list below. PORTS does not consider those named on the list of "Emergency Line of Executive Succession" to be Emergency Coordinators. The Plant Shift Superintendent/Incident Commander continues his obligations for oversight of the emergency response.

- General Manager
- Plant Manager
- Other personnel as designated by the General Manager and trained and qualified as Crisis Manager

G-4A NOTIFICATION [OAC 3745-54-56 (A)]

This section describes the methods used for notifying PORTS Emergency Response Forces, other plant personnel and appropriate Local, State and Federal Agencies in time of an emergency.

Notification refers to required communication within mandated time frames and according to a predetermined sequence, of general information on the nature and severity of an emergency event. Notification is different from reporting because it must occur without delay for the purpose of alerting or activating, rather than informing. Notification requirements vary according to reported event level and may continue to change depending upon preliminary classification, ongoing assessments, full classification and any changes in classification.

The Plant Shift Superintendent is responsible for categorizing an event as an emergency and assigning an emergency classification. The Plant Shift Superintendent is responsible for initial notifications in accordance with Federal and State Regulations. Subsequent notifications may be the responsibility of the Plant Shift Superintendent in his role as Incident Commander or the Crisis Manager after the PORTS Emergency Operations Center becomes operational.

In any event, a prearranged format is used to ensure that the content of the notification message(s) includes the emergency classification, whether a hazardous substance and toxic chemical, hazardous waste or hazardous waste constituent, mixed waste or mixed waste constituent release is occurring or expected and identification of the response and/or protective actions taken or recommended.

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Figure G-3, Emergency Notification Form (or a similar form that meets RCRA regulatory requirements), is used for notification of an emergency. Predesignated offsite agencies are notified within 15 minutes of classification of an emergency.

PRIMARY AND ALTERNATE SYSTEMS

Primary and alternate systems are in place for notifications to the Emergency Response Organization and offsite agencies. Periodic testing is conducted according to site Emergency Preparedness Implementing Procedures.

NOTIFICATION OF ONSITE PERSONNEL

Members of the PORTS Emergency Response Organization are notified of a need to respond to an emergency by a variety of ways including automatic alarms, pagers, radios, public address system and telephones.

Plant personnel not assigned to the Emergency Response Organization receive notification of an onsite emergency condition by one of eight different alarms followed by announcements over the plant's public address system. An example of plant alarms includes a continuous sounding alarm that means for plant personnel to evacuate a building and go to their assigned assembly area. To account for all plant personnel, the accountability alarm consists of seven (7) short blasts repeated three (3) times.

NOTIFICATION OF STATE AND COUNTY GOVERNMENTS

Telephone notification is made to the Pike County 24-hour Contact Point and the Ohio Emergency Management Agency and the Ohio Environmental Protection Agency. When a site area emergency is declared, the notification to the county's 24-hour Contact Point will include a reminder that at upon the site area emergency classification, the public warning system will be activated to notify the residents in the two-mile immediate notification area (INA).

The public warning system consists of five outdoor warning sirens, tone alert radio receivers, and the Emergency Broadcast System (EBS).

NOTIFICATION OF DOE

Notification to DOE Headquarters, the Portsmouth/Paducah Project Office, and the DOE Oak Ridge Field Office is made by telephone or verbal or facsimile messages.

NOTIFICATION OF FLUOR-B&W PORTSMOUTH LLC CORPORATE PERSONNEL

Corporate personnel are notified of an emergency at PORTS by telephone or verbal or facsimile messages.

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G-4B IDENTIFICATION OF HAZARDOUS SUBSTANCES AND TOXIC CHEMICALS [OAC 3745-54-56(B)]

Upon arrival at the scene of an emergency, the Plant Shift Superintendent/Incident Commander will immediately make an assessment of the character, source, amount and extent of the release that has occurred.

In the event of a release, fire, or explosion, the identification of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents in the X-326 Waste Storage Units would be accomplished by direct observation of the leaking container or by the container inventory system maintained by the Waste Management (WM) Division.

This system maintains accountability for each container. The record for a container includes the generator data, analytical results and location in the storage unit. Because the wastes are segregated by compatibility and type, the location of the emergency may identify the material. The accountability systems are updated as frequently as necessary (often daily) to maintain an accurate container inventory.

The container inventory system is computerized with backup of data in a filing system. The data for any given container can be accessed from a computer terminal within five (5) minutes. Communications with Waste Management would be by telephone or radio. Should power be interrupted, and the computer system become inoperable, the paper back-up filing system would be used. By the location of the incident, Waste Management personnel could locate the proper files which will reveal the contents of the containers involved. A third method of identification is the collection and analysis of samples. All sampling of air, soil, water, or pooled wastes will be performed in accordance with established standards, such as SW-846, ASTM, or others. All analyses will be performed in accordance with regulatory agency approved methods, such as SW-846 or in the case of radioactive contamination, in accordance with laboratory analytical methods/standard operating procedures.

G-4C HAZARD ASSESSMENT [OAC 3745-54-56 (C)]

In the event of an emergency, the Plant Shift Superintendent/Incident Commander has at his disposal any and all personnel and resources to assist and/or advise in the assessment of the situation and its amelioration. The Plant Shift Superintendent/Incident Commander will base the assessment on all available information including process knowledge, material safety data sheets, models of air, surface water or groundwater flow patterns, and specific health based environmental criteria or limits which may be exceeded. Environmental surveillance air sample data, at a minimum, will be collected and evaluated. By utilization of this existing database and trained personnel, the Plant Shift Superintendent/Incident Commander will be able to assess both the direct and indirect effects potentially caused by the emergency. Personnel routinely available to the Plant Shift Superintendent/Incident Commander for advice and consultation include those with skills and experience in chemistry, biology, engineering, industrial hygiene, safety, regulatory compliance, process engineering and operations, health physics, medicine and other sciences. Key personnel are on call to respond to the Plant Shift Superintendent/Incident Commander at any time. If the appropriate personnel are not promptly available, the Plant Shift Superintendent/Incident Commander has been granted the authority by plant management to act on the available information and to utilize his best judgment. Existing plant emergency procedures, methods, and policies, with which the Plant Shift Superintendent/Incident Commander and the Shift Emergency Response Organization are routinely trained and exercised, provide the Plant Shift Superintendent/Incident Commander with the assistance to exercise his best judgement with confidence.

If the assessment of the emergency situation indicates that evacuation of plant personnel is required, the Plant Shift Superintendent/Incident Commander will notify the necessary personnel and area or building evacuation will be initiated. If it is determined that offsite populations must be evacuated, the Plant Shift

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segregation procedures of the storage units and their procedures to prevent hazards are also applicable to ensuring that there will be no incompatibility problems.

G-4H POST EMERGENCY EQUIPMENT MAINTENANCE [OAC 3745-54-56(H)(2) AND (I)]

Following its use in an emergency or routine maintenance situation, all equipment is cleaned/decontaminated of hazardous substance and toxic chemical or residual excavated materials prior to being placed into storage for reuse as necessary. The purpose of the cleaning is twofold: 1) to maintain the equipment in usable condition; and 2) to prevent the spread of and/or unnecessary exposure to hazardous and/or radioactive materials.

Expendable supplies such as disposable personal protective equipment are inventoried and replaced as required as part of the decontamination activities. These decontamination activities are performed after the generated residues are containerized and sampled (as necessary) to ensure only compatible materials are stored together. The completion of the site cleanup is to include the maintenance of equipment and the replenishment of supplies, which will then be reported to the Administrator of Environmental Protection Agency (EPA) Region V, the Director of Ohio EPA and any other applicable state or local agency prior to the resumption of normal operations.

G-4I CONTAINER SPILLS AND LEAKAGE [OAC 3745-54-52(A)-(E), 3745-55-71]

Spill control equipment shall be located and available in the hazardous waste storage units at all times. Waste Management operating procedures provide detailed steps for handling and replacing leaking containers.

The general procedure that is followed is:

1. The spill or leak is contained using an inert absorbent if it can be safely done by personnel detecting the spill or leak. Once the spill or leak is safely contained, clean-up activities shall begin immediately.
2. Chemical Operations personnel, Environmental Compliance personnel, the Plant Shift Superintendent/ Incident Commander, and, if necessary, emergency response personnel are notified to provide safe clean-up guidelines and equipment.
3. The contents of the drum will be transferred to a container as specified in Table D-1 or the drum and contents will be placed in an overpack drum as stated in the procedure.

Regulatory Compliance will evaluate the occurrence against current regulations and determine the reporting requirements and, if necessary, draft appropriate notifications.

After the emergency has been abated, the transfer of additional hazardous wastes into the storage area will be discontinued until the area is properly cleaned. There is sufficient space in other onsite storage areas to accommodate this material for several weeks.

G-4J TANK SPILLS AND LEAKAGE [OAC 3745-55-93]

PORTS is not seeking a permit for any tanks; therefore, this section does not apply.

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G-4K SURFACE IMPOUNDMENT SPILLS AND LEAKAGE [OAC 3745-56-27]

PORTS is not seeking a permit for any surface impoundments; therefore, this section does not apply.

G-5 EMERGENCY EQUIPMENT [OAC 3745-54-52(E)]

FIRE EXTINGUISHING EQUIPMENT

The closest fire department is operated by USEC. This fire department maintains a full time dedicated fire department, which includes three pumpers: 1 - with a 1500 gallons per minute (gpm) pump and 1000 gallon tank; 1 - with a 1500 gpm pump and a 500 gallon tank and 1 - with a 1200 gpm pump and a 500 gallon booster tank; 1 - mini-pumper with 300 gpm pump and a 300 gallon booster tank, and a 4-wheel drive heavy rescue vehicle, and two ambulances. The department has a truck; for carrying all types of miscellaneous emergency equipment. In addition, the department operates several pickup trucks. Each vehicle and its complement of equipment is checked at the start of each shift and a complete inventory is taken each week. This equipment and staff are housed in a modern, eight bay, brick building known as the X-1007 Fire Station. Included in the fire station is a modern, computerized alarm room.

There are two separate firewater distribution systems at PORTS. The high-pressure fire water system services all sprinkler systems and the fire hydrants in the newer areas of the plant. It has a 4-hour fire flow of 16,000 gpm at 125 pounds per square inch (psi). The low-pressure system is also known as the sanitary water system and services the fire hydrants in the older area of the plant. It has a 4-hour fire flow of 5,000 gpm at 75 psi. Fire hydrant spacing on both systems is nominally 300 feet. The fire hydrants in the area of X-326 are on the low-pressure system. The PORTS Fire Department is located in Building X-1007, about 1,000 feet from the X-326 Storage Units.

Along with the fire protection systems at PORTS, the X-326 building has a set of portable fire extinguishers available. Each unit is inspected on a routine basis. NFPA Class A, B, C or combination extinguishers can be found in most areas and are generally located 75 feet apart or approximately one for each 1250 ft² of floor space per NFPA standards. These units are to be used for small fires (e.g. waste baskets, paper on desk) only, as general personnel are not trained to fight significant fires.

EMERGENCY AND SPILL CONTROL EQUIPMENT

The container storage units have an extensive array of emergency and spill control equipment available for routine and emergency use. All equipment is maintained on a preventative maintenance schedule as recommended by the manufacturer. The list of equipment is presented as Table G-2.

In addition to the emergency equipment, DOE/Fluor-B&W Portsmouth LLC has a wide variety of heavy equipment (lifting and earth moving) available for use, in an emergency, by agreement with USEC.

PERSONAL PROTECTIVE EQUIPMENT

PORTS maintains a wide variety of personal protective equipment including respiratory protection; protective clothing, including chemical-resistant encapsulating suits; and self-contained breathing apparatus.

The types of respiratory protection available include organic vapor half-face, full-face and, fresh air respirators; and the aforementioned self-contained breathing apparatus. Protective clothing includes cloth coveralls, aprons, shoes, boots, various types of gloves and headgear. The chemical-resistant encapsulating suits are maintained by the USEC Fire Department Personnel who receive special training in the use, testing and inspection of such equipment.

Emergency response personal protective equipment consisting of both Level A and Level B Equipment is assigned to and is either carried on fire vehicles or is stored in the X-1007 Fire Station.

Level A Equipment consisting of positive-pressure self-contained breathing apparatus, full-encapsulating chemical resistant suits with built-in gloves, steel shank boots, a hard hat and extra gloves are carried on the fire department emergency truck. Extra positive-pressure self-contained breathing apparatus and extra air bottles are also stored on this vehicle.

Level B Equipment is worn by all responding firemen and consists of complete fire turnout gear and self-contained breathing apparatus. Additional positive-pressure self-contained breathing apparatus is available on all fire apparatus except the two ambulances. These responders normally wear white cotton gloves under their regular work gloves, and have available to them plastic booties to wear over their boots, if such protection is needed.

Tyvec coveralls, cotton gloves, skull caps, respiratory protection, plastic booties, and extra air bottles are also carried on the emergency truck. An additional supply of these items are stored in supply cabinets in the X-1007 Fire Station.

Once the situation has been stabilized by the immediate response of the fire department and the potential hazards of fire and explosion have been reduced to an acceptable level, cleanup is completed by the USEC Chemical Operations Department with the Fire Department on standby. The personal protective equipment of the chemical operators is normally Level D and occasionally Level C. The level of protection is determined by the Industrial Hygienist after determining the nature of the material spilled, taking and evaluating instrument readings for that material, and consulting with the Plant Shift Superintendent/Incident Commander, fire captain and safety personnel so that all potential hazards are considered.

INTERNAL COMMUNICATIONS AND ALARM SYSTEMS

PORTS emergency communications and alarms are established in a variety of methods. The most familiar and easily usable is the telephone. The dialing of the emergency number (911) on any plant telephone will automatically connect the caller with the USEC Fire Department. The caller will be requested to describe the nature of the emergency and location and be told to remain, if possible, at the scene until emergency personnel arrive.

Another familiar alarm device is the fire alarm boxes located in virtually every building on plantsite. When tripped, the alarms will sound in the fire department. Personnel sounding the alarm should remain as close to the alarm box as is safely possible in order to guide emergency response personnel to the occurrence scene.

Other alarms include bells, whistles, and horns which sound in a variety of ways depending on the nature and extent of the emergency. For example, in the event of an emergency, a personnel accountability alarm may

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be sounded (seven rings on a bell, repeated three times) and/or, if an evacuation is necessary, a horn will sound with a continuous blast.

Emergency communications may also be accomplished by means of hand held two-way radios. A dedicated emergency frequency is assigned, and an alternate frequency may be utilized, if necessary. All personnel who may have use of a two-way radio are instructed as to its proper use.

EXTERNAL

The telephone is the primary means of external communication. Both hazardous waste storage units have telephones. The Plant Shift Superintendent, Fire Department and Police Department have radio capability to monitor and communicate directly with the area emergency responders. PORTS also has facsimile and electronic information transfer capability to communicate with those who have compatible equipment.

FIRST AID AND MEDICAL EQUIPMENT

PORTS has a doctor and nurses who can administer the full range of first aid and stabilization techniques to injured or ill personnel. The PORTS Hospital has an emergency room, examination suites and three holding beds. It is staffed on day-shift Monday through Friday excluding holidays with a physician on day-shift. The Fire Department maintains two fully equipped ambulances and most fire department personnel are certified Emergency Medical Technicians or Paramedics. These services are available through an agreement with USEC.

DECONTAMINATION EQUIPMENT

Emergency decontamination equipment for injured personnel and responder decontamination is carried on the plant emergency truck, ambulances, and fire apparatus. Additional equipment and neutralizing solutions are stored in the X-1007 Fire Station or the X-101 Hospital. This equipment generally consists of responder protective equipment, decontamination solutions, solution containment devices, and contaminated clothing storage bags.

Gross decontamination of responders is generally accomplished by using safety showers or sanitary showers in affected buildings, with decontamination solutions being stored in proper containers awaiting characterization or by decontamination with portable hoses and/or sprayers. Decontamination solutions can be collected in portable pools for proper characterization, treatment and disposal.

Heavy equipment may be decontaminated by use of water hoses, portable high pressure water or steam cleaners. Prior to this step, all gross contamination is brushed off of the affected surfaces, to limit the concentration in the decontamination solutions. Solutions and solids potentially contaminated with hazardous constituents are collected, sampled and properly disposed of following analytical data review.

G-6 COORDINATION AGREEMENTS [OAC 3745-54-37, 3745-54-52(C)]

An agreement with USEC provides the services of an onsite hospital, fire department, and police department. As the primary provider of emergency services to DOE/Fluor-B&W Portsmouth LLC, USEC

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Exit Points - Pike Avenue - Roto Gate

Evacuation Routes:

Primary

Persons evacuating from Emergency Egress Roto Gate Pedestrian Gate-7 will proceed north on Pike Avenue, persons evacuating from Emergency Egress Roto Gates will proceed south on Pike Avenue. They will then proceed east on 11th Street and assemble at the X-106, Monitoring Station #2.

Alternate

Persons evacuating from these Emergency Egress Roto Gates will proceed south on Pike Avenue, turn left and proceed east on 10th Street, turn right and proceed south on Mahoning Avenue, turn left and proceed east on 7th Street and assemble at the X-109C, Monitoring Station #1.

G-8 REQUIRED REPORTS [OAC 3745-54-56(J)]

Within 15 days of the incident, PORTS will provide a written report on the occurrence to the Region V Administrator and the Director of Ohio Environmental Protection Agency through DOE. Copies will be included in the operating record. The report will include at a minimum:

1. Name, address and telephone number of the owner or operator;
2. Name, address and telephone number of the facility;
3. Date, time and type of incident (e.g. fire, explosion);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of the actual or potential hazards to human health or the environment, Where applicable;
7. Estimated quantity and disposition of recovered material that resulted from the occurrence;
8. Any other information as the director may require.

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**TABLE G-1 PORTSMOUTH GASEOUS DIFFUSION PLANT EMERGENCY COORDINATORS
(PLANT SHIFT SUPERINTENDENTS)**

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Danny Nichols	Non-responsive	Non-responsive	Not Available
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree	Non-responsive		
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

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ATTACHMENT J.1

1999 DIRECTOR'S FINAL FINDINGS AND ORDERS

Fluor-B&W Portsmouth, LLC is not a party to the 1999 Director's Final Findings and Orders. With respect to Fluor-B&W Portsmouth, LLC's obligation to perform work under the 1999 Director's Final Findings and Orders, this obligation arises from Fluor-B&W Portsmouth, LLC's contract with DOE. Consequently, any obligations under the 1999 Director's Final Findings and Orders that Fluor-B&W Portsmouth, LLC may have through contract with DOE terminate when Fluor-B&W Portsmouth, LLC is no longer responsible under contract.

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ATTACHMENT J.2

1989 CONSENT DECREE

Fluor-B&W Portsmouth, LLC is not a party to the 1989 Consent Decree. With respect to Fluor-B&W Portsmouth, LLC's obligation to perform work under the 1989 Consent Decree, this obligation arises from Fluor-B&W Portsmouth, LLC's contract with DOE. Consequently any obligations under the 1989 Consent Decree that Fluor-B&W Portsmouth, LLC is no longer responsible under contract.

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**SECTION N
CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy

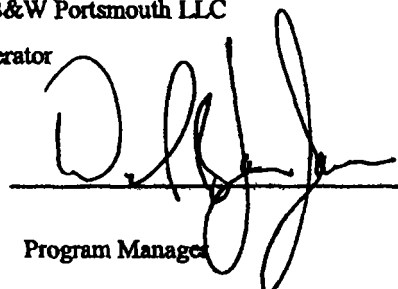
Owner and Operator

 _____ 10/15/2010
Site Manager Date Signed

Fluor-B&W Portsmouth LLC

Co-Operator

BY:

 _____ 10/15/10
Program Manager Date Signed

The Department of Energy has signed this application for the permitted facility as owner and operator and Fluor-B&W Portsmouth LLC has signed as co-operator. The Department has determined that dual signatures best reflect the actual apportionment of responsibility under which the Department's RCRA responsibilities are for policy, programmatic, funding and scheduling decisions, as well as general oversight; and, the contractor's RCRA responsibilities for day-to-day operations, (in accordance with general directions given by DOE as part of its general oversight responsibility), including but not limited to, the following responsibilities: waste analysis and handling, monitoring, record keeping, reporting, and contingency planning. For purposes of the certification required by OAC 3745-50-42(D), the DOE and Fluor-B&W Portsmouth LLC representatives certify, to the best of their knowledge and belief, the truth, accuracy and completeness of the application for their respective areas of responsibility.

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**CLOSURE PLAN FOR THE X-326 UNIT
PORTSMOUTH GASEOUS DIFFUSION PLANT**

Date Issued —

**Prepared for the
U.S. Department of Energy
Office of Environmental Restoration and Waste Management**

**Fluor-B&W Portsmouth LLC
Managing the
Decontamination and Decommissioning and
Environmental Remediation Activities at the
Portsmouth Gaseous Diffusion Plant
under contract DE-AC30-10CC40017
for the
U.S. DEPARTMENT OF ENERGY**

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1. FACILITY DESCRIPTION**OCT 15 2010****1.1 GENERAL DESCRIPTION**

The Portsmouth Gaseous Diffusion Plant (PORTS) is owned by United States Department of Energy (DOE) and is contractor managed by Fluor-B&W Portsmouth LLC. For the purposes of this permit application, DOE and Fluor-B&W Portsmouth, LLC are Co-Operators of the X-326 Hazardous Waste Storage Units.

PORTS is located at 39°00'30" N latitude and 83°00'28" W longitude on a federally owned reservation in Pike County, Ohio. Pike County, one of the state's lesser populated counties, encompasses an area of approximately 444 square miles. The site is located approximately equidistant between Chillicothe and Portsmouth, Ohio. The plant site is approximately 4 miles southeast of Piketon, Ohio, 1.5 miles east of U.S. Route 23, 2 miles east of the Scioto River, and 70 miles south of Columbus, Ohio (see Figure 1).

PORTS has operated since 1954, enriching uranium for national defense and commercial nuclear reactors. That enrichment was accomplished by the gaseous diffusion process. As of 1993, all uranium enrichment operations at PORTS are conducted by the United States Enrichment Corporation (USEC), formed as a government-owned corporation by the Energy Policy Act of 1992 that became private in July 1998. As such, DOE's mission at the PORTS site has changed to environmental restoration, waste management, removal of highly enriched uranium, decontamination and demolition activities, and operation of nonleased facilities.

As a result of historical enrichment operations, which is typical of large industrial plants, a wide variety of hazardous wastes are generated. These include analytical laboratory wastes, spent solvents, electroplating wastes, paint wastes, sludges, corrosive wastes, and environmental restoration generated wastes.

The X-326 Storage Unit is located in the central part of the PORTS site (see Figure 2). The X-326 Building was in use from 1956 through 2001 for the enrichment of uranium hexafluoride. The structure is 2,230 feet long, 552 feet wide, and 62 feet high. It contains 58 acres of floor space. The X-326 Building is totally enclosed with a built-up roof, transite walls, and concrete floors. There are seven areas of the building, totaling approximately 38,105 square feet, designated for the storage of hazardous wastes. The storage areas are located on the first floor towards the south end of the building (see Figure 3).

The X-326 Storage Unit is intended for the storage of high assay uranium bearing hazardous wastes until further uranium classification, or off-site shipment for recovery, treatment, or disposal is completed. Waste types to be stored in the X-326 hazardous waste storage areas may include any or all of the waste codes specified in the Part A Permit Application.

Seven areas have been delineated for the storage of hazardous wastes in the X-326 building. These are Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the East Cage and the West Cage). Storage area floors are primed and finished with a urethane-based sealant. All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are six to nine inches thick and constructed of concrete.

1.1.1 TOPOGRAPHIC MAP

The U.S. Geological Survey (USGS) topographic map for the facility is shown in Section B, Figure B-2. Topographic details of the X-326 Storage Unit area are shown on Figure 3.

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1.2 HYDROGEOLOGIC INFORMATION

1.2.1 GEOLOGIC AND HYDROLOGIC SETTINGS

The PORTS facility lies near the western margin of the Appalachian Highlands within the Appalachian Plateau Province. The physiography of this area is typified by rugged, irregularly dissected hills and ridges separated by generally mature drainage systems. The topographic highs are erosional remnants of the more competent units of the Paleozoic bedrock which underlie the area.

The facility lies to the south of the terminus of Pleistocene glaciation, however, two distinct physiographic features of glacial origin are present in the area. The most prominent of these features are large flat expanses of glacio-lacustrine deposits which fill preglacial topographic depressions. Deeply incised stream valleys which formed during periods of high flow resulting from glacial meltwater are also present locally.

Most of these valleys are partially filled with alluvial material and many are occupied by streams which are orders of magnitude smaller than the ones which originally formed the valleys.

The PORTS facility is situated on one of the glacio-lacustrine deposits formed when drainage of the preglacial Teays River was obstructed and prehistoric Lake Tight was impounded. Lake Tight occupied both the main Teays River valley and many of its tributary valleys, including the Portsmouth and Newark River valleys. Fine-grained sediments accumulated within Lake Tight, forming lacustrine deposits of silt and clay as much as 50 feet thick. Figure 4 exhibits regional stratigraphic information at the PORTS facility.

Bedrock in the area consists of sedimentary strata of marine origin which were deposited during the Paleozoic Era. The formations which comprise the bedrock beneath the PORTS facility belong to the Waverly Group, and they are described below.

The Cuyahoga Formation is comprised of sandstone, conglomerate, and shale. Locally the Cuyahoga is predominantly composed of gray shale, and it is present on both the east and west side of the facility where it outcrops on the hills. The Cuyahoga formation is 250 to 300 feet thick.

The Sunbury shale is described as a hard, "bony", fissile shale. It is typically highly carbonaceous and black in color. The unit averages 20 feet in thickness throughout its known range, and it has been reported to have a maximum thickness of about 30 feet. However, the formation is highly variable, and in the vicinity of the PORTS facility the Sunbury averages only 8 to 10 feet in thickness. The Sunbury may have been removed from some areas due to erosion either before the deposition of the Lake Tight sediments (Teays formation) or in relatively recent times.

The Berea sandstone is comprised of a fine-grained sandstone interspersed with thin shale beds and laminae. The unit is gray to brown in color and 25 to 40 feet thick in the subject area. The sandstone beds range in thickness from 6 inches to 2 feet and are described as weather resistant, with "regular jointing" at right angles to bedding surfaces. In Pike County the uppermost 6 to 10 feet of the unit is reported to be massive with few bedding planes or shale laminae. Below this upper unit a 20 to 35 foot thick blue and gray sandstone interbedded with shale is present. This unit is reported to increase in shale content downsection so that it exhibits a gradational contact with the underlying Bedford shale.

PORTSMOUTH GASEOUS DIFFUSION PLANT HAZARDOUS WASTE MANAGEMENT PERMIT CO-OPERATOR TRANSFER AGREEMENT

I. PARTIES

This agreement is between **LATA/Parallax Portsmouth, LLC** (LPP), the present co-operator under RCRA Part B Permit OH7890008983 (the RCRA Permit), and **Fluor-B&W Portsmouth LLC** (FBP), the succeeding co-operator under that permit.

II. PURPOSE

The purpose of this agreement is to designate the date of January 17, 2011, as the date upon which the responsibility to implement the RCRA Permit as co-operator with the U.S. Department of Energy shall be transferred from LPP to FBP, as required by Section 3745-50-52(C) of the Ohio Administrative Code.

III. SCOPE

The scope of this agreement is limited solely to the purpose of this agreement as stated in Part II of this agreement.

IV. BACKGROUND

On August 16, 2010, the U.S. Department of Energy (DOE) awarded the contract for the decontamination and decommissioning of the Portsmouth Gaseous Diffusion Plant to FBP. Included within the scope of that contract are certain activities that currently are the responsibility of LPP, including hazardous waste management. In order to fulfill its responsibility in managing hazardous waste, LPP is designated as the co-operator under the RCRA Permit, with DOE deemed to be the owner and co-operator. Under the contract awarded to FBP, FBP will become the co-operator with DOE in the RCRA Permit.

By: _____

Linda R. Bauer, Ph.D
Project Manager
LATA-Parallax Portsmouth LLC

10/15/2010

DATE

By: _____

Woodrow B. "Jamie" Jameson
Program Manager
Fluor-B&W Portsmouth LLC

10/15/10

DATE

Environmental Regulatory Compliance History

For Fluor-B&W Portsmouth LLC

In Support of the Transfer of the Co-Operator on the Portsmouth Gaseous Diffusion Plant RCRA Permit from LATA/Parallax LLC to Fluor-B&W LLC

This document summarizes the RCRA regulatory compliance history for Fluor Federal Services and Babcock and Wilcox (B&W) Technical Services Group, the two parent companies of Fluor-B&W Portsmouth LLC and their compliance history or non-RCRA environmental permits in the state of Ohio. Together across the two parent companies, the Fluor and B&W team holds (or recently held) 9 RCRA-related operating or management permits.

The first five summary tables below identify the 9 RCRA-related permits, facility locations, and provide a compliance summary extending back in time up to 5 years of operation. The footnotes attached to the summary tables provide explanations of any noted compliance events. The sites and facilities covered include the Fernald site in Ohio (managed by Fluor Fernald); the Hanford facility in the State of Washington (managed by Fluor Hanford); the Savannah River Site in South Carolina (managed by Savannah River Nuclear Solutions, of which Fluor Corporation is a partner); the Y-12 National Security Complex in Oak Ridge, Tennessee (operated by B&W Technical Services Group); and the Pantex Plant in Texas (operated by B&W Technical Services Group). The sixth summary table provided below then summarizes the environmental permit compliance history for non-RCRA related environmental permits historically held by either of the Fluor-B&W parent companies in the State of Ohio.

The six summary tables and accompanying footnotes follow.

Fluor RCRA Permits in Ohio

Table 1: Fernald Site Actively Managed RCRA Permits By Year (Fluor Fernald)

RCRA Part B Permit for entire Fernald site	0	0	1	1	1	1	
A. Number of releases of a hazardous substance, material, waste, radionuclide, and/or other regulated constituent from an activity that you or your subcontractor were responsible for, in an amount equal to or greater than 2 times the reportable quantities specified in 40 CFR Part 302, that resulted in serious environmental damage.						1 ⁽¹⁾	See footnote (1)
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	0	0	0	0	0	
C. Number of releases above any other	0	0	0	0	0	0	

permit requirements not reported above.							
---	--	--	--	--	--	--	--

Footnote 1 - A release of mixed waste from a drum container to the ground occurred at Fernald in 2004. Fluor Fernald reported the release under CERCLA because it exceeded a reportable quantity. No report was required under SARA Title III because the release was confined to the site.

As a corrective action, Fluor Fernald increased the frequency of stored waste container inspections and enhanced the inspection criteria. There have been no recurrences. (**Contract:** Fernald Closure Contract.)

Fluor RCRA Permits Outside Ohio

Table 2: Hanford Site Actively Managed RCRA Permits By Year (Fluor Hanford)

A. Number of releases of a hazardous substance, material, waste, radionuclide, and/or other regulated constituent from an activity that you or your subcontractor were responsible for, in an amount equal to or greater than 2 times the reportable quantities specified in 40 CFR Part 302, that resulted in serious environmental damage.	0	0	0	1 ⁽²⁾	0	0	See footnote (2)
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	1 ⁽³⁾	1 ⁽⁴⁾	0	0	1 ⁽⁵⁾	See footnotes (3), (4), and (5).
C. Number of releases above any other permit requirements not reported above.	0	0	0	0	0	0	

Footnote 2 - On December 15, 2006, 400 gallons of used oil were released from a holding tank in the 200 East Area of central Hanford. The spill was caused by tumbleweeds that were blown with enough force to open a swag lock valve on the belly of the tank storing the oil. Gusts of up to 74 mph winds were recorded that day by the Hanford Meteorology Station. The spill was reported to regulators and workers used absorbing pads to help contain it. The oil was not radioactively contaminated and the 30 cubic yards of oil-contaminated sandy soil beneath the tank has been dug up and dispositioned. No fine or penalty was assessed. (**Contract:** Project Hanford Management Contract).

Fluor Hanford self-reported the event. Fluor Hanford took immediate action to clean up the release. In addition, Fluor Hanford evaluated in-use systems/components with similar potential for accidental release to ensure adequate engineered design to preclude a future inadvertent material release in high winds.

Fluor Hanford issued a formal DOE Lessons Learned Information Bulletin. Fluor has had no recurrence of events where high winds caused a material release to the environment.

Footnote 3 - A Notice of Violation was received from the State of Washington Department of Ecology (Ecology) on March 4, 2008 in response to a dangerous waste compliance inspection of the T Plant Complex that was conducted June through August 2007. The inspection identified one violation of WAC 173-303 regarding waste designation. The concerns identified were related to waste accumulation, container management, and personnel training. DOE-RL letter 08-AMCP-0181 to Ecology, dated May 9, 2008, transmits a list of containers in storage at T Plant and provides closure for the action items. At the May 22, 2008 Project Managers Meeting, Ecology stated that they were satisfied with the response provided by DOE-RL. This action is considered closed. No fines or penalties were assessed. (**Contract:** Project Hanford Management Contract).

The NOV cited one violation and three concerns. The violation concerned designation of dangerous waste. The three concerns addressed accumulation of dangerous waste, use and management of containers in terms of major risk markings, and personnel training documentation. To address the violation, Fluor submitted a report identifying containers of dangerous and mixed waste in storage since before January 1, 2007. To address the concerns, Fluor performed the following actions:

- Reduced the current inventory of active accumulated dangerous waste at T Plant to two 55-gallon drums
- A visual inspection of all waste containers in T Plant to identify and correct container labels which may be damaged or faded
- Revised the T Plant Dangerous Waste Training Plan to include course numbers where OJT was previously identified.

The Department of Ecology was satisfied with the corrective actions taken and there have been no recurrences.

Footnote 4 - On October 30, 2007, the U.S. EPA issued a Consent Agreement and Final Order in the matter of a PCB spill that occurred on June 1, 2006 at Twin City Metals. The ruling identified 8 violations of 40CFR 761.60(a)(1) and 2 violations of 40CFR 761.207. Civil penalties assessed were \$54,800 to Fluor Hanford and \$30,000 to Twin City Metals (TCM). Fluor Hanford paid the fine on November 26, 2007, thereby closing this action. (**Contract:** Project Hanford Management Contract).

In February, 2005, Fluor let a "sale of scrap metal" contract to Twin City Metal (TCM). Although transformers can be "scrap metal," the contract did not specifically mention PCB-contaminated material or transformers in the scope of work; however, the kick-off meeting did include a discussion of transformer shipments. TCM failed to disclose that transformers were out of scope and were prohibited from their site. Numerous transformers were sent to TCM until, on May 31, 2006, in a scrap metal shipment containing 68 transformers, Fluor Hanford inadvertently shipped an electrical transformer still filled with dielectric oil with a PCB concentration of 250 ppm. The transformer was breached at the TCM facility and oil was spilled to the soil. Upon learning of the spillage, Fluor self-reported the incident to the EPA and filed an ORPS report with DOE. Fluor managed the off-site clean-up effort. Over the next several months, Fluor contracted an independent assessment, led by Parallax, Inc., and conducted an internal causal analysis. Corrective actions were completed in many areas, including the due diligence process for letting contracts, the internal process for excessing materials, Fluor's emergency response process, and the formality of the communications process with EPA. Since the strengthening of these processes, there have been no similar recurrences.

Footnote 5 - On September 21, 2004, the Washington Department of Ecology (WDOE) issued Administrative Order No. 1671 (AO) and Notice of Penalty No. 1672 (NOP) to DOE Richland Operations (RL), DOE Office of River Protection (ORP), Fluor Hanford, Inc. (FH), and Duratek Federal Services of Hanford, Inc. The orders alleged that the named parties violated four provisions of the state Dangerous Waste regulations. In particular, it was alleged that the violations were related to the Savannah River Technical Center treatability studies on Hanford Tank Farm wastes, certain procedures used to process and conduct such studies, and the return of the residues from the treatability studies to Hanford. The NOP contains an assessed penalty of \$270,000. On October 20, 2004, RL, ORP, FH, and Duratek filed appeals to both the AO and the NOP. However, at the request of DOE, citing policy grounds, the parties dismissed their appeals. (**Contract:** Project Hanford Management Contract)

The unique situation regarding this case was that the samples were being returned in compliance with the

"Treatability Study" exemption rules and materials that had contacted the samples were being returned to Hanford as "sample returns". They were not declared waste until after they arrived at Hanford. DOE and the contractors asserted this was allowed by law and is the practice in other states. The Washington Department of Ecology disagreed and asserted DOE and the contractors were transporting regulated waste as material not waste. DOE and the contractors have made no further transport of such materials. Fluor has modified its Hanford practices to be consistent with the Washington Department of Ecology requirements and there have been no recurrences.

Table 3: Savannah River Site Actively Managed RCRA Permits By Year (Savannah River Nuclear Solutions)

RCRA Hazardous Waste – SRS is a single RCRA facility ID#SC1890008989, currently assigned 37 TSD units, of which 16 require operating permits, 8 are in post-closure, and 13 require closure plans.	1	1	-	-	-	-	
RCRA Solid Waste – Three solid waste landfills, two ash landfills, and one C&D landfill	1	1	-	-	-	-	
RCRA Underground Storage Tank	7	7	-	-	-	-	
A. Number of releases of a hazardous substance, material, waste, radionuclide, and/or other regulated constituent from an activity that you or your subcontractor were responsible for, in an amount equal to or greater than 2 times the reportable quantities specified in 40 CFR Part 302, that resulted in serious environmental damage.							
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	0	-	-	-	-	
C. Number of releases above any other permit requirements not reported above.	0	0	-	-	-	-	

The table above reflects the number and types of permits managed at the Savannah River Site (SRS) by Savannah River Nuclear Solutions (SRNS), after SRNS Transition was completed on August 1, 2008. Fluor Corporation is a partner in SRNS.

B&W Technical Services Group RCRA Permits in Ohio

None.

B&W Technical Services Group RCRA Permits Outside Ohio

Table 4: Y-12 National Security Complex Actively Managed RCRA Permits By Year (B&W Technical Services Group)

Hazardous Waste Management Permit	1	1	1	1	1	1	
Hazardous Waste Transporter Permit	1	1	1	1	1	1	
RCRA Container Storage Units Permit	1	1	1	1	1	1	
A. Number of releases of a hazardous substance, material, waste, radionuclide, and/or other regulated constituent from an activity that you or your subcontractor were responsible for, in an amount equal to or greater than 2 times the reportable quantities specified in 40 CFR Part 302, that resulted in serious environmental damage.	0	0	0	0	0	0	
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	0	1 ⁽⁶⁾	1 ⁽⁷⁾	0	0	See Footnotes (6) and (7)
C. Number of releases above any other permit requirements not reported above.	0	0	0	0	0	0	

Footnote 6 – 2007: TDEC NOV issued during RCRA annual inspection; resolved without fine or penalty/corrective action. Added label to container.

Footnote 7 – 2006: TDEC NOV issued for failure to properly manage universal RCRA hazardous waste (Lamps); resolved without fine or penalty; conditions corrected, no further enforcement action pending.

Table 5: Pantex Plant Actively Managed RCRA Permits By Year (B&W Technical Services Group)

Industrial and Solid Waste Management Act Permit No. 144-1-0000-0000-1000	1	1	1	1	1	1	
Regulates management of hazardous waste treatment and storage facilities and processes							
A. Number of releases of a hazardous substance, material, waste, radionuclide, and/or other regulated constituent from an activity that you or your subcontractor were	0	0	0	0	0	0	

responsible for, in an amount equal to or greater than 2 times the reportable quantities specified in 40 CFR Part 302, that resulted in serious environmental damage.							
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	0	0	0	0	0	
C. Number of releases above any other permit requirements not reported above.	0	0	0	0	0	0	

Other Fluor Non-RCRA Related Environmental Permits in Ohio

Table 6: Fernald Site Actively Managed Environmental Permits By Year (Fluor Fernald)

Fernald NESHAP Air Permit (Waste Pits Remedial Action Project Facility)	0	0	0	0	0	1	
Fernald NESHAP Air Permit	0	0	1	1	1	1	
NPDES Water Permit for treated water discharge to Great Miami River	0	0	1	1	1	1	
A. Number of releases above any federal, state, and local environmental permit requirements.	0	0	0	0	1 ⁽⁸⁾	1 ⁽⁹⁾	
B. Number of Environmental Protection Agency or state equivalent agency enforcement actions, amount of fine, penalty, and/or settlement conditions for each, and enforcement authority that took action.	0	0	0	0	0	0	

Footnote 8 – In 2005, Fluor Fernald exceeded discharge limits set by Ohio EPA in the site's NPDES permit. Most exceedances were for total suspended solids. No penalties were associated with any of the exceedances. Fluor Fernald had no air exceedances. (**Contract:** Fernald Closure Project).

Footnote 9 – In 2004, Fluor Fernald exceeded discharge limits set by Ohio EPA in the site's NPDES permit. Most exceedances were for total suspended solids. No penalties were associated with any of the exceedances. Fluor Fernald had no air exceedances. (**Contract:** Fernald Closure Project).

Other B&W Technical Services Group Non-RCRA Related Environmental Permits in Ohio

None.



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

MAR 31 2010

Mr. Christopher Korleski, Director
Ohio Environmental Protection Agency
50 West Town Street Suite 700
Columbus, Ohio 43215

PPPO-03-251-10

Dear Mr. Korleski:

**CLASS 1 RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT
MODIFICATION DEPARTMENT OF ENERGY/PORTSMOUTH GASEOUS
DIFFUSION PLANT 04-66-0680/OH7890008983**

The United States Department of Energy (DOE) is requesting the enclosed Class 1 administrative modifications (not requiring approval) to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit.

The modifications make the following changes to the Resource Conservation and Recovery Act (RCRA) Part B Permit Application:

- Replaced the previous Emergency Coordinator with the new Emergency Coordinator on Page G-5.
- Replaced the previous Primary Contract with new Primary Contact in Table G-1.
- Updated home telephone numbers for two Plant Shift Superintendents in Table G-1.

The pages with new language in capital letters and strikethroughs are provided to aid the Ohio Environmental Protection Agency (EPA) in identifying changes to the permit renewal application. The clean-copy replacement pages are for inclusion in the permit renewal application. The submission date is stamped on each page.

The following items are included with this submittal:

- Pages with strikethroughs and new language in capital letters identifying the proposed changes to the permit renewal application
- Clean-copy replacement pages for the permit renewal application
- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D)

DOE appreciates Ohio EPA's efforts in working with us to maintain the facility's RCRA Part B Permit Application.

If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "WE Murphie", with a long horizontal flourish extending to the right.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures:

1. Proposed Change Pages, G-5, G-23
2. Clean Copy Replacement Pages, G-5, G-23
3. Certificate Statement

cc w/enclosures:

M. Rafferty, PPPO/PORTS
J. Lee, U.S. EPA/Region 5
J. Carroll, Ohio EPA/Columbus
J. Sferra, Ohio EPA/SEDO
M. Stewart, Ohio EPA/SEDO
L. Bauer, LPP/PORTS
PPPO Records/LEX
Administrative Records

MAR 31 2010

SUBMISSION DATE:

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle-iron dike set in a chemically-resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is ~~William A. Frass~~ DARL ANDERSON. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA/Parallax Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

SUBMISSION DATE: MAR 31 2010

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
William A. Franz DARL ANDERSON	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an Incident will be the Emergency Coordinator.

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8"-angle iron-dike set in a chemically-resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is Darl Anderson. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA/Parallax Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

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Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

SUBMISSION DATE: JUN 20 2007

5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.

6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion

- A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
- B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
- C. Use of water or water and chemical fire suppressant could result in contaminated runoff.

2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

- A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- B. The spill could cause the release of toxic liquids or fumes.
- C. The spill can be contained onsite, but the potential exists for groundwater contamination.
- D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

~~Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health, or the environment, he will report his findings as follows:~~

- 1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
- 2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
- 3. To Ohio Emergency Response Team at 800/282-9378.

SUBMISSION DATE: MAR 31 2010

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Darl Anderson	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

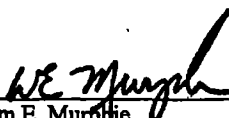
SUBMISSION DATE: JUN 20 2007

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.)


Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
Portsmouth/Paducah Project Office

MAR 31 2010
Date



L. R. Bauer, Ph.D.
Project Manager
LATA/Parallax Portsmouth LLC

03/10/2010
Date



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

NOV 19 2009

Mr. Christopher Korleski, Director
Ohio Environmental Protection Agency
50 West Town Street Suite 700
Columbus, Ohio 43215

PPPO-03-137-10

Dear Mr. Korleski:

**CLASS 1 HAZARDOUS WASTE PERMIT MODIFICATION, PERMIT NO.
04-66-0680/OH7890008983**

The Department of Energy (DOE) is requesting the enclosed Class I administrative modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit.

The modification makes the following change to the Hazardous Waste Part B Permit Application:

- Replacement of previous Emergency Coordinator with new Emergency Coordinator on Page G-5
- Replacement of previous Primary Contact with new Primary Contact in Table G-1

A page with the changes identified in capital letters and a clean-copy are included in this submittal. The page with new language in capital letters is provided to aid the Environmental Protection Agency (EPA) in identifying changes to the permit renewal application. The clean-copy replacement pages are for inclusion in the permit renewal application. The submission date is stamped on the page.

The following items are included with this submittal:

- A page with new language in capital letters that identifies the proposed changes to the permit renewal application
- Clean-copy replacement page for the permit renewal application
- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D)

Mr. Korleski

-2-

PPPO-03-137-10

DOE appreciates Ohio EPA's efforts in working with us to maintain the facility's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,



William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures:

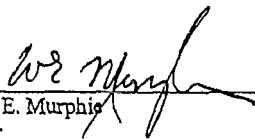
1. Page G-5 and G-23 Proposed change in Capital Letters
2. Page G-5 and G-23 Clean-Copy Replacement Pages
3. Certification Statement

cc w/enclosures:

J. Lee, U.S. EPA/Region 5
J. Carroll, Ohio EPA/Columbus (2)
J. Sferra, Ohio EPA/Logan
M. Stewart, Ohio EPA/Logan
W. Franz, LPP/PORTS
Administrative Records
PPPO Records/LEX

Certification Statement

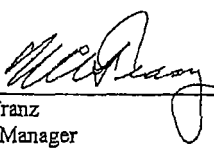
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
Portsmouth/Paducah Project Office



Date



W. A. Franz
Project Manager
LATA/Parallax Portsmouth LLC



Date

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is WILLIAM A. FRANZ ~~Michael A. Kennicott~~. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA/Parallax Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

SUBMISSION DATE: JUN 20 2007

5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.

6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion

- A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
- B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
- C. Use of water or water and chemical fire suppressant could result in contaminated runoff.

2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

- A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- B. The spill could cause the release of toxic liquids or fumes.
- C. The spill can be contained onsite, but the potential exists for groundwater contamination.
- D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health, or the environment, he will report his findings as follows:

- 1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
- 2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
- 3. To Ohio Emergency Response Team at 800/282-9378.

Table G-1
 Portsmouth Gaseous Diffusion Plant Emergency Coordinators
 (Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT ¹			
Michael A. Kenicott WILLIAM A. FRANZ	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

SUBMISSION DATE: JUN 20 2007

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.)

SUBMISSION DATE: NOV 19 2009

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is William A. Franz. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA/Parallax Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

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3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

~~SUBMISSION~~ DATE: JUN 20 2001

5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.
6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
 - C. Use of water or water and chemical fire suppressant could result in contaminated runoff.
2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
 - B. The spill could cause the release of toxic liquids or fumes.
 - C. The spill can be contained onsite, but the potential exists for groundwater contamination.
 - D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous wastes or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health, or the environment, he will report his findings as follows:

1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
3. To Ohio Emergency Response Team at 800/282-9378.

SUBMISSION DATE: NOV 19 2009

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT ¹			
William A. Franz	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			
Jim McCleery			
Bryan Miller			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

SUBMISSION DATE: JUN 20 2007

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.)



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

Mr. Christopher Korleski, Director
Ohio Environmental Protection Agency
50 West Town Street Suite 700
Columbus, Ohio 43215

APR 29 2009

PPPO-03-189-09

Dear Mr. Korleski:

**CLASS 1 RCRA PART B PERMIT MODIFICATION DEPARTMENT OF
ENERGY/PORTSMOUTH GASEOUS DIFFUSION PLANT 04-66-0680/OH7890008983**

The United States Department of Energy (DOE) is requesting the enclosed Class 1 administrative modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The permit was modified in January to reflect the change in the primary emergency contact in Table G-1; however, the change to Section G-2 was missed.

The modification makes the following change to the RCRA Part B Permit Application:

- Section G-2 has been updated to name Michael A. Kennicott as the primary contact for the contingency plan.

A page with the changes identified in capital letters and a clean-copy are included in this submittal. The page with new language in capital letters is provided to aid the Environmental Protection Agency (EPA) in identifying changes to the permit renewal application. The clean-copy replacement pages are for inclusion in the permit renewal application. The submission date is stamped on the page.

The following items are included with this submittal:

- A page with the old permit application language struck through and new language in capital letters that identifies the proposed changes to the permit renewal application
- Clean-copy replacement page for the permit renewal application
- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D)

DOE appreciates Ohio EPA's efforts in working with us to maintain the facility's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "W E Murphie", is written over a horizontal line.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures:

1. Proposed Change Page
2. Clean Copy Replacement Page
3. Certificate Statement

cc w/enclosures:

M. Rafferty, PPPO/PORTS
J. Lee, U.S. EPA/Region 5
J. Carroll, Ohio EPA/Columbus
J. Sferra, Ohio EPA/SEDO
M. Stewart, Ohio EPA/SEDO
W. Franz, LPP/PORTS
Administrative Records

Certification Statement

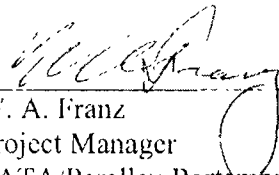
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
Portsmouth/Paducah Project Office

4/29/09

Date



W. A. Franz
Project Manager
LATA/Parallax Portsmouth LLC

4/29/09

Date

Page with new language in capital letters (Not for insertion)

SUBMISSION DATE:

Seven waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5, 6 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1-8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is ~~David Kent~~ MICHAEL A. KENNICOTT. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between LATA Parallax Portsmouth LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,
2. Dial 911 on any plant phone and report to answering party; or
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent (cell phone users dial 740-897-3025), or

Clean Page (for insertion into Part B Permit Application)

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SUBMISSION DATE: JUN 20 2007

5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Services arrives; then provide details.

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- C. Use of water or water and chemical fire suppressant could result in contaminated runoff.

2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

- A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- B. The spill could cause the release of toxic liquids or fumes.
- C. The spill can be contained onsite, but the potential exists for groundwater contamination.
- D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

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- 1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
- 2. To government officials or the National Response Center (using 800/424-8802) and include:
 - A. Name and phone number of reporter;
 - B. Name and address of facility;
 - C. Time and type of incident;
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility.
- 3. To Ohio Emergency Response Team at 800/282-9378.

047890008983



Shel

LPP/ESH&Q-07-098
July 26, 2007

Distribution


DOE Contract DE-AC24-05OH20192: Class 1 Resource Conservation and Recovery Act (RCRA) Notification – OAC 3745-50-51

The purpose of this letter is to provide notice in accordance with OAC 3745-50-51 of Class 1 modifications to the RCRA Part B Permit (04-66-0680) issued to the United States Department of Energy and LATA/Parallax Portsmouth, LLC by the Ohio Environmental Protection Agency. The Class 1 modifications address the following permit change:

- Removed the X-7725 storage unit from the permit. This unit was closed in accordance with the RCRA Part B Closure Plan

If you have any questions regarding this notification, please contact Rosemary Richmond (740) 897-2967.

Sincerely,

 *for Paul Kreitz*
Paul Kreitz
Project Manager

PK:RR:jmt

cc: Dave Kent, LPP
Dave Koslowski, PPO/LEX
Dan McKenzie, LPP
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/PORTS
File – ESH&Q
File – LPP RMDC-RC

OH 789 000 8983



LPP/ESH&Q-07-016
January 18, 2007

RECEIVED
JAN 25 2007

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Distribution

Contract DE-AC24-05OH20192: Class 1 Resource Conservation Recovery Act Notification – OAC 3745-50-51

The purpose of this letter is to provide notice in accordance with OAC 3745-50-51 of the following Class 1 Modification to the Resource Conservation Recovery Act Part B Permit (04-66-0680) at the Portsmouth Gaseous Diffusion Plant. The Class 1 Modification addressed the following permit change:

- Removal of X-7725 Storage Unit Areas B, H, J, K, L, P, P1, and 4A from the permit following closure in accordance with the Ohio EPA approved closure plan.

If there are any questions regarding this notification, please contact Rosemary Richmond at (740) 897-2967.

Sincerely,

Paul Kreitz
Project Manager

PK:RR:jmt

cc: Rachel Blumenfeld, PPPO/LEX
Dave Kent, LPP
Dave Koslowski, PPO/LEX
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/PORTS
File-ESH&Q
File- LPP RMDC-RC



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, Ohio 43216-1049

CERTIFIED MAIL

September 1, 2006

Re: **U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant**
US EPA ID No: OH7890008983
Ohio ID No: 04-66-0680
Modified Hazardous Waste Permit

William E. Murphy
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
P.O. Box 700
Piketon, Ohio 45661-0700

Dear Mr. Murphy:

On June 5, 2006, Ohio EPA received U.S. Department of Energy Portsmouth Gaseous Diffusion Plant's (DOE Ports) request to modify the current storage area resulting in up to a 25% increase in the facility's container storage capacity for the X-326 storage area. For this modification, DOE Ports submitted a Class 2 permit modification application¹. The Agency received written comments concerning the Class 2 Permit modification and these comments are addressed in the responsiveness summary. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) action that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

¹Ohio EPA assigned tracking # 060605-2-1 to this modification application.
Bob Taft, Governor

Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director



Printed on Recycled Paper

William E. Murphie
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
September 1, 2006
Page 2

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Melody Stewart of Ohio EPA's Southeast District Office at (740) 385-8501.

Sincerely,



Pamela S. Allen, Manager
Regulatory and Information Services
Division of Hazardous Waste Management

cc: Jeremy Carroll/Pam McCoy, CO, ERAS, DHWM
Harriet Croke, U.S. EPA, Region V
Dave Chenault, SEDO, DHWM
Carol Hester, Ohio EPA, PIC
file

PUBLIC NOTICE

Pike County

OHIO EPA ISSUES FINAL MODIFIED HAZARDOUS WASTE PERMIT

On September 1, 2006, Ohio EPA issued a final class 2 modified Hazardous Waste Facility Installation and Operation Permit (Permit) to U.S. DOE Portsmouth Gaseous Diffusion Plant (U.S. DOE Ports) for its facility at 3930 U.S. Route 23 South, Piketon, Ohio 45661. The EPA Identification Number for this facility is OH7890008983.

Why is U.S. DOE Ports modifying its Permit?

U.S. DOE Ports was used to enrich uranium until 2001. The hazardous waste permit authorizes the facility to store hazardous waste in containers. U.S. DOE Ports requests to modify the current storage area resulting in up to 25% increase in the facility's container storage capacity for the X-326 storage unit. This final modified permit will allow U.S. DOE Ports to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than October 6, 2006. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: **Environmental Review Appeals Commission**, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: **Joseph P. Koncelik, Director of Ohio EPA**, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A.

OHIO ENVIRONMENTAL PROTECTION AGENCY

SEP - 1 2006

ENTERED DIRECTOR'S JOURNAL **MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**

Date of Issuance: September 1, 2006

Effective Date: September 1, 2006

U.S. EPA ID No.: OH7 890 008 983

Ohio Permit No.: 04-66-0680

Name of Permittee: United States Department of Energy

Mailing Address: Portsmouth GDP
P.O. Box 700
Piketon, Ohio 45661-0700

Facility Location: 3930 U.S. Route 23 South
Piketon, Ohio 45661

Person to Contact: William E. Murphie

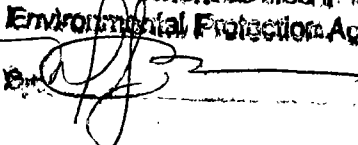
This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 15, 2001, is hereby incorporated by reference in its entirety, except as it may be modified herein.

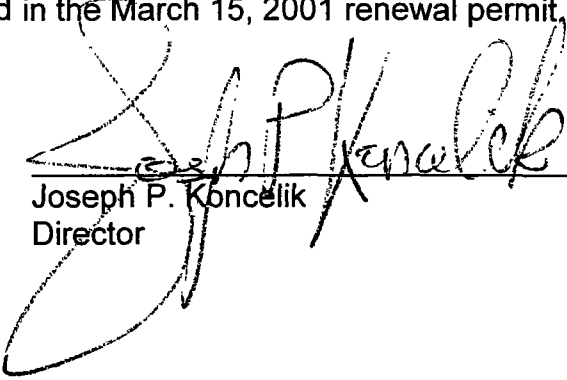
This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on June 5, 2006. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency

 9-1-06

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the March 15, 2001 renewal permit.



Joseph P. Konecny
Director

PortsGDP.permitpg.wpd

OHIO EPA DHWM

SEP 01 2006

SEP 01 2006

MODULE C - CONTAINER STORAGE

C. CONTAINER STORAGE AND MANAGEMENT

The activities covered by this module consist of storage of containers of hazardous and mixed waste in the X-326 and X-7725 buildings as described in the following tables and figures in Section D of the permit application, and all other terms and conditions of this permit.

Table D-1 - Container Information

Table D-2 - Maximum Container Stacking Heights

Table D-3 - Maximum Number of Containers, X-326 Unit

Table D-4 - Maximum Number of Containers, X-7725 Unit

Table D-5 - X-7725 Container Storage Unit- Secondary Containment Calculations

Table D-6 - Summary of Containment Area Information for X-7725

Figure D-1 - X-7725 Building Layout - Level I

Figure D-2 - X-7725 Building Layout - Level IV

Figure D-3 - X-326 Building Floor Plan

C. 1. Process Capacity/Annual Quantity Limitation

OAC Rule 3745-50-43(A)(7)

- (a) The Permittee shall not store more than 161,920 gallons of containerized waste at any given time in the permitted container area, located in building X-326 and no more than 3,230,971 gallons at any given time in the permitted storage areas located in building X-7725. The Permittee shall store hazardous waste and mixed waste in the types of containers described in Section D of the approved Part B application.
- (b) For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste or mixed waste equal to its capacity, regardless of the actual quantity stored in the container.
- (c) The provisions of Conditions C.1(a) and C.2 shall not apply to the Permittee's activities as a generator accumulating hazardous waste and mixed waste on-site in compliance with the provisions of OAC Rule 3745-52-34(A).

However, when accumulating waste within the permitted container storage area, in accordance with OAC Rule 3745-52-34(A), the Permittee shall not, for

SEP 01 2006

the total amount of hazardous waste and mixed waste stored and accumulated, exceed the maximum container storage inventory established under this Condition.

C.2. Waste Identification

ORC Sections 3734.02(F) and 3734.05(H); and OAC Rule 3745-50-43

The Permittee shall store in containers only the hazardous waste codes specified in Section A of the Part B application.

C.3. Condition of Containers

OAC Rule 3745-55-71

If a container holding hazardous or mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous or mixed waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit or the hazardous waste facility chapters of the OAC.

C.4. Compatibility of Waste with Containers

OAC Rule 3745-55-72

The Permittee shall use containers that are compatible with the hazardous or mixed waste to be stored.

C.5. Management of Containers

OAC Rule 3745-55-73

- (a) All container storage shall be conducted within the container storage units as described in Condition C.1. of this permit and Section D of the approved Part B permit application.
- (b) The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak.
- (c) In the event lab-pack waste are generated they shall be handled in compliance with applicable storage requirements.
- (d) In the event lab-pack waste are generated they shall be packaged in drums containing absorbent material that is compatible with the waste.

**Responsiveness Summary For Comments
On Portsmouth Gaseous Diffusion Plant Modification Request
June 5, 2006**

1. Comment Received:

"We feel that the Piketon plant shouldn't be given a waste permit modification. The Portsmouth Gaseous Diffusion plant is not a waste storage plant this modification could open the doors to other waste.

"EPA Identification Number is OH 7890008983"

"On July 22, 2006 Ohio EPA issued a final class 3 hazardous waste facility installation and operation permit modification to the U.S. Department of Energy Portsmouth Gaseous Diffusion plant locate [sic] in Piketon, Ohio. PRESS ask that you help keep the waste out of Piketon, Ohio.

The health of the workers and the community has been effect [sic] by the past operation of the Piketon plant. Help clean up the site so we can get other plants to come here for better employment. Don't make us a waste site.

Thank you, Vina Colley (PRESS)"

1. Response:

A letter from the Director was sent to Vina Colley on August 8, 2006. Letter is attached.

END OF COMMENTS



State of Ohio Environmental Protection Agency

EET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

August 8, 2006

Ms. Vina Colley
PRESS President
3706 McDermott Pond Creek Road
McDermott, Ohio 45652

Re: Portsmouth Gaseous Diffusion Plant Permit Modification

Dear Ms. Colley:

Thank you for your July 25, 2006, letter concerning waste storage and the issuance of a hazardous waste permit modification to the Portsmouth Gaseous Diffusion Plant in Piketon, Ohio.

As you may or may not know, the Portsmouth Gaseous Diffusion Plant was first issued a permit for the storage of hazardous waste on August 21, 1995. A renewed permit was issued on March 15, 2001, and is effective until it expires on March 15, 2011. This permit allows the Portsmouth Gaseous Diffusion Plant to store hazardous waste that is generated on-site in two (2) hazardous waste storage areas. These storage areas are commonly referred to as the X-7725 and X-326 storage areas. It needs to be noted that the Portsmouth Gaseous Diffusion Plant is not permitted to receive hazardous waste from other facilities.

In your letter, you reference a Class 3 hazardous waste facility permit modification which was issued on July 22, 2006. This modification which actually occurred on June 22, 2006, was for a name change for the co-operator (Bechtel Jacobs Company LLC to LATA/Parallax Portsmouth LLC). It did not involve any waste storage issues.

Currently, Ohio EPA is reviewing a Class 2 permit modification which was received on June 5, 2006. This modification is currently under review and concerns the storage of hazardous waste generated on-site. The permit modification requests the Portsmouth Gaseous Diffusion Plant to increase the amount of hazardous waste stored in the existing X-326 storage area. Currently the X-326 storage area is permitted to store 133,000 gallons. If the Class 2 permit modification is approved, 161,920 gallons of hazardous waste could be stored in the X-326 storage area. The applicant states this Class 2 permit modification is needed to off-set the loss of storage capacity in the existing X-7725 storage area. The loss of storage capacity in the X-7725 storage area is due to a change in building use and proposed closure of the permitted X-7725 storage area. Overall, the permitted storage capacity of hazardous waste has decreased from levels allowed in the 2001 permit.

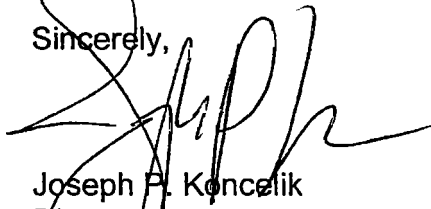
Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

Ms. Vina Colley
Page 2
August 8, 2006

The proposed Class 2 modification is subject to public comment from June 7, 2006 to August 7, 2006. Ohio EPA will consider your letter as a public comment and will further address your concerns in the review and Responsiveness Summary.

I hope I have adequately addressed your concerns regarding these issues. Please feel free to contact Melody Stewart in our Southeast District Office with any additional questions or concerns you may have at (740) 380-5256.

Sincerely,



Joseph P. Kencel
Director

JPK/MS/mlm



State of Ohio Environmental Protection Agency

RECEIVED ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, Ohio 43216-1049

***Certified Mail
Return Receipt Requested***

***Re: Portsmouth Gaseous Diffusion Plant
EPA ID #: OH7 890 008 983
Modified Hazardous Waste Permit***

June 22, 2006

William E. Murphie
Portsmouth Gaseous Diffusion Plant
PO Box 700
Piketon, Ohio 45661-0700

Dear Mr. Murphie:

On June 1, 2005, Ohio EPA received Portsmouth Gaseous Diffusion Plant's request to change the contractor serving as co-operator of the facility from Bechtel Jacobs Company, LLC to LATA Parallax Portsmouth, LLC (LLP). For this modification, Portsmouth Gaseous Diffusion Plant submitted a Class 3 modification application¹. The Agency did not receive written comments concerning this Class 3 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC) no later than 30 days after the public notice (See Ohio Revised Code § 3745.04). You may file your appeal with ERAC at the following address: Environmental Review Appeals Commission, 309 South Fourth Street, Room 222, Columbus, Ohio 43215.

If you file an appeal, you must put it in writing. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. You must send a copy of the appeal to the director of the Ohio Environmental Protection Agency no later than three (3) days after you file it with ERAC.

¹Ohio EPA assigned tracking # 050601-3A-1 to this modification application.

Bob Taft, Governor

Bruce Johnson, Lieutenant Governor

Joseph P. Koncellik, Director



Printed on Recycled Paper

Ohio EPA is an Equal Opportunity

William E. Murphie
Portsmouth Gaseous Diffusion Plant
June 22, 2006
Page 2

If you have any questions, please contact Melody Stewart of the Southeast District Office at (740) 385-8501.

Sincerely,



Pamela S. Allen, Manager
Regulatory and Information Services
Division of Hazardous Waste Management

cc: Jeremy Carroll/Christopher Hunt, ERAS, DHWM
Harriet Croke, U.S. EPA, Region V
Dave Chenault/Melody Stewart, SEDO, DHWM
Carol Hester, Ohio EPA, PIC

G:\USERS\Lterry\USDOEPortsFinalClass3Fijnal6'06modcvltr

PUBLIC NOTICE

Pike County

OHIO EPA ISSUES FINAL CLASS 3 HAZARDOUS WASTE PERMIT MODIFICATION

On June 22, 2006, Ohio EPA issued a final Class 3 hazardous waste facility installation and operation permit (Permit) modification to the U.S. Department of Energy's Portsmouth Gaseous Diffusion Plant (U.S. DOE Portsmouth) for its facility at 3980 U.S. Route 23 South, Piketon, Ohio 45661. The EPA Identification Number for this facility is OH7890008983.

Why is U.S. DOE Portsmouth Modifying its Permit?

The U.S. DOE Portsmouth Plant was used to enrich uranium until 2001. The hazardous waste permit authorizes the facility to store hazardous waste in containers. U.S. DOE Portsmouth is requesting a Class 3 modification to change the contractor serving as co-operator of the facility from Bechtel Jacobs Company, LLC to LATA Parallax Portsmouth, LLC (LLP). The final Permit modification contains the conditions under which the facility must operate. To issue this Permit modification, Ohio EPA determined that the Permit application is complete and meets appropriate standards

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than **July 25, 2006**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. You must file your appeal, according to Ohio Revised Code §§ 3745.04 and 3745.07, with ERAC at the following address: ***Environmental Review Appeals Commission***, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: ***Joseph P. Koncelik, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A.
JUN 22, 2006
OHIO ENVIRONMENTAL PROTECTION AGENCY
MODIFIED OHIO HAZARDOUS WASTE FACILITY
ENTERED DIRECTOR'S OFFICE
INSTALLATION AND OPERATION PERMIT

Date of Issuance: June 22, 2006
Effective Date: June 22, 2006

U.S. EPA ID No.: OH7 890 008 983
Ohio Permit No.: 04-66-0680

Name of Permittee: Portsmouth Gaseous Diffusion Plant

Mailing Address: P.O. Box 700
Piketon, Ohio 45661-0700

Facility Location: 3390 U.S. Route 23 South
Piketon, Ohio 45661

Person to Contact: William E. Murphie

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on March 15, 2001, is hereby incorporated by reference in its entirety, except as it may be modified herein.

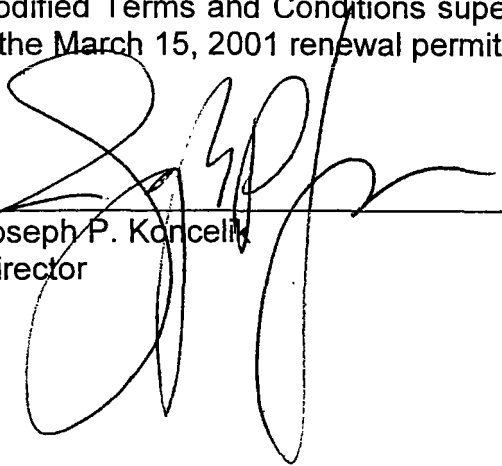
This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on June 1, 2005. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency

By:  Date: 6-22-06

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the March 15, 2001 renewal permit.



Joseph P. Kuncelik
Director

PortsmouthDirect Mod pg.jms.wpd

OHIO EPA DHWM

JUN 22 2006

OHIO ENVIRONMENTAL PROTECTION AGENCY
OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: United States Department of Energy

Mailing
Address: Portsmouth GDP
P.O. Box 700
Piketon, Ohio 45661-0700

Owner: United States Department of Energy
P.O. Box 700
Piketon, Ohio 45661-0700

Operator: United States Department of Energy
Co-Operator LATA/Parallax Portsmouth, LLC (LPP)
P.O. Box 700
Piketon, Ohio 45661-0700

Location: Portsmouth GDP
P.O. Box 700
Piketon, Ohio 45661-0700

Ohio Permit No.	01-86-0628
USEPA ID	01-86-003-986
Issue Date	03/15/2001
Effective Date	03/15/2001
Expiration Date	03/15/2011

AUTHORIZED ACTIVITIES

In reference to the application of Portsmouth Gaseous Diffusion Plant (GDP) for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- ◆ Container Storage

PortsmouthPERMITCOVERPAGE[1].jms wpd

OHIO E.P.A.

JUN 22 2006

**OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT**

**SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE
INSTALLATION AND OPERATION PERMIT**

**U. S. Department of Energy
Portsmouth Gaseous Diffusion Plant**
U.S. EPA ID #: OH7 890 008.983
Ohio ID #: 04-66-0680

Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Portsmouth Gaseous Diffusion Plant to make the following change:

Class 3 Modification:

This modification changes the contractor serving as co-operator of the facility from Bechtel Jacobs Company LLC to LATA/Parallax, LLC (LLP).

portsmouth.cls3 summ mod.jms.wpd

OHIO EPA DHWM

JUN 22 2006



047890008983

LPP/ESH&Q-05-115
June 2, 2006

Distribution

**Subject: Portsmouth Gaseous Diffusion Plant (PORTS) Resource Conservation and Recovery Act (RCRA)
Part B Permit Modification**

The purpose of this letter is to provide notice that an application to modify Resource Conservation and Recovery Act (RCRA) Part B Permit (04-66-0680) has been submitted to the Ohio Environmental Protection Agency (EPA). This RCRA Part B Permit has been issued to the United States Department of Energy (DOE) and LATA/Parallax Portsmouth, LLC (LPP). The Class 2 modification will add storage space to the X-326 Unit. This additional storage space is being requested to offset some of the storage space that will be eliminated after closure of a separate permitted storage unit.

In accordance with Ohio Administrative Code 3745-50-51 a notice must be provided to persons listed on the Ohio EPA's mailing list when a Part B Permit modification application is submitted to Ohio EPA. You are receiving this letter because you are listed on the mailing list.

The modification is available for public comment for a 60-day period beginning June 7, 2006. The permit modification and supporting documents have been included in the DOE Environmental Information Center and are available for public review at the following location and times. Interested parties must contact the Information Center in advance of the visit to be placed on the plant's security access list.

U.S. Department of Energy's
Environmental Information Center
3930 U.S. Route 23
Perimeter Road
Piketon, Ohio 45661

Monday and Tuesday, 9:00 a.m. to 12 noon; Wednesday and Thursday 12 noon to 4:00 p.m. Telephone (740) 289-3317. A public meeting will be held from 6:00 p.m. to 8:00 p.m. on Tuesday, June 27, 2006 at The Ohio State University Endeavor Center, 1864 Shyville Road, Piketon, Ohio to discuss the permit modification.

The following points of contact have been established concerning this modification application:

- Melda Rafferty, U.S. Department of Energy, (740) 897-5521
- David Kent, LATA/Parallax Portsmouth, LLC, (740) 897- 2572
- Melody Stewart, Ohio Environmental Protection Agency, (740) 380-5256

Comments should be sent to:

Melody L. Stewart
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
2195 Front Street
Logan, OH 43138

The permittee's compliance history during the life of the permit being modified is available from the agency contact person.

P.O. Box 855 • Piketon, OH 45661 • Phone: (740) 897-2015 • www.lpports.com

Distribution
une 2, 2006
PP/ESH&Q-05-115
Page 2

If you do not wish to be on the mailing list please contact Rosemary Richmond 740 897-2967.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Kreitz". The signature is fluid and cursive, with a large initial "P" and a stylized "K".

Paul Kreitz
Project Manager

GGM:jmb

Attachment: As stated

cc: Rachel Blumenfeld, PPPO/LEX
Bill Franz, LPP
Rick Holbrook, LPP
Dave Kent, LPP
Mark Polley, LPP
Melda Rafferty, PPPO/PORTS
Rosemary Richmond, LPP
File-ESH&Q
File-DMC-RC



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

MAY 31 2006

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-03-133-06

Dear Mr. Koncelik:

**CLASS 2 RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT
MODIFICATION, PERMIT NO. 04-66-0680/OH7890008983**

The Department of Energy (DOE) is requesting the enclosed Class 2 modification to the Resource Conservation and Recovery Act (RCRA) Part B Permit for the DOE Portsmouth Gaseous Diffusion Plant (PORTS). In order to support the United States Enrichment Corporation's proposed Gas Centrifuge Enrichment Plant, DOE plans to close all permitted storage areas in the X-7725 unit. In light of these plans, additional permitted storage capacity is needed in the X-326 unit to support ongoing and future DOE missions. Accordingly, the enclosed modification would increase permitted storage capacity in the X-326 storage unit. Additionally, the enclosed modification would make minor technical changes to clarify requirements, update information, and improve operating efficiency (e.g., update contact information, allow use of temporary ramps). In accordance with discussions with your staff, this modification would qualify as a Class 2 modification, as the amount of storage space to be added is less than 25% of the current RCRA permitted storage capacity for the PORTS facility.

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D),
- A summary index identifying the proposed changes to the RCRA Part B Permit and Application,
- Strikeout pages for the RCRA Part B Permit and Application (to aid in identifying the proposed textual changes),
- Replacement pages for the RCRA Part B Permit and Application, including modified drawings (to be inserted into the Permit/Application).

Mr. Koncelik

-2-

PPPO-03-133-06

DOE appreciates the Ohio Environmental Protection Agency's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,



William E. Murphie

Manager

Portsmouth/Paducah Project Office

Enclosure

cc w/enclosure:

R. Miskelley, PPPO/LEX

H. Croke, USEPA/Region V

P. Allen OEPA/COL, 2 copies

Michowicz, OEPA/Logan

M. Stewart, OEPA/Logan

Administrative Records

cc w/o enclosure:

R. Blumenfeld, PPPO/LEX

P. Kreitz, LPP/PORTS

Certification Statement

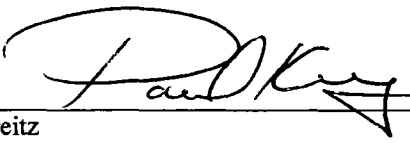
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphie
Manager
Portsmouth/Paducah Project Office

5/31/06

Date



Paul Kreitz
Project Manager
LATA/Parallax Portsmouth LLC

5/24/06

Date



OH 789000 8983

LPP/ESH&Q-06-049
February 28, 2006

Distribution

Contract DE-AC24-05OH20192: Class 1 Resource Conservation Recovery Act Notification – OAC 3745-50-51

The purpose of this letter is to provide notice in accordance with OAC 3745-50-51 of the following Class 1 Modification to the Resource Conservation Recovery Act Part B Permit (04-66-0680) at the Portsmouth Gaseous Diffusion Plant. The Class 1 Modification addressed the following permit change:

- Section G Contingency Plan changes to clarify Ohio EPA notification requirements

If there are any questions regarding this notification, or if you no longer wish to receive these notifications, please contact Rosemary Richmond at (740) 897-2967.

Sincerely,

Paul Kreitz
Project Manager

PK:RR:jmb

cc: Rachel Blumenfeld, PPPO/LEX
Dave Kent, LPP
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/PORTS
File-ESH&Q
File- LPP RMDC-RC



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

FEB 06 2006

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-03-079-06

Dear Mr. Koncelik:

CLASS 1 HAZARDOUS WASTE PERMIT MODIFICATION – PERMIT NO. 04-66-0680/OH78900008983

Please find enclosed a Class 1 modification (not requiring the Director's prior approval) to the Department of Energy (DOE) Portsmouth Gaseous Diffusion Plant (PORTS) Hazardous Waste (Part B) Permit. The modification changes the name of the LATA/Parallax Portsmouth LCC (LPP) Project Manager and clarifies Emergency Notification language in Section G of the permit.

The following items are included with this submittal:

- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D), and
- Strike-out and clean copy replacement pages G-3, G-7, and G-32 for Section G, Contingency Plan.

The DOE appreciates the Ohio Environmental Protection Agency's efforts in working with us to maintain the facility's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "William E. Murphie", is written over a horizontal line.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosure

cc w/enclosure:

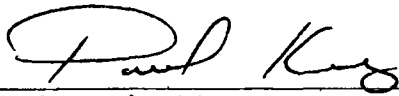
H. Croke, USEPA/Region V
P. Allen, OEPA/Columbus (2 copies)
J. Michnowicz, OEPA/Logan
M. Stewart, OEPA/Logan
P. Kreitz, LPP/PORTS
Administrative Records

cc w/o enclosures:

R. Blumenfeld, DOE/PPPO
R. Miskelley, DOE/PPPO

Certification Statement

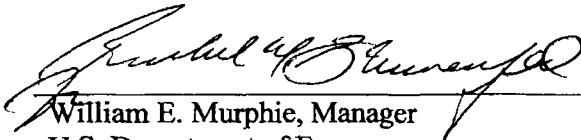
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Paul Kreitz, Project Manager
LATA/Parallax Portsmouth, LLC

1/17/06

Date



William E. Murphie, Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office

2/6/06

Date

**Please insert in Volume 1, Text, Section G
(clean-copy replacement pages)**

EMERGENCY NOTIFICATION FORM

A-3138 (12/13/05)

Page 1 of 2

This is the Portsmouth Gaseous Diffusion Plant, located in Piketon, Ohio, with (check one)
(Repeat Line)

- ☐ an **EMERGENCY** notification
☐ a DRILL/EXERCISE notification

*1. This is Emergency Notification Number: _____

*2. This is _____ from the Portsmouth Gaseous Diffusion Plant calling with information regarding an emergency at the Plant. Please use the following phone numbers and/or locations for additional information: Plant Shift Superintendent's Office (740) 897-3025 or Emergency Operations Center (740) 897-2309 or (740) 897-4019.

*3. Emergency Classification: (check one)

- a. ☐ ALERT at _____ hrs.
b. ☐ SITE AREA EMERGENCY at _____ hrs.
c. ☐ Terminated at _____ hrs.
d. ☐ Classification changed at _____ hrs.
e. ☐ Other: _____

EAL Section: _____

*4. Event Description: _____

*5. Plant Status (impact on plant): (check one)

- a. ☐ Operating b. ☐ Shutdown c. ☐ Being Shutdown

*6. OFF-SITE Protective Actions Recommended:
(check one)

- a. ☐ No protective actions recommended at this time.
b. ☐ Off-site sheltering recommended within 2-mile Immediate Notification Area.
c. ☐ Other: _____

*7. Public Warning Siren Activation: (check one)

- a. ☐ Have **not** been recommended.
b. ☐ Have been recommended (required for all Site Area Emergencies)

*8. EAS Message Recommended: (check one)

- a. ☐ Message #1, No Actions Required e. ☐ Message #5, Exercise/Drill
b. ☐ Message #2, Sheltering Required f. ☐ Message #6, Unintentional Siren
c. ☐ Message #3, Evacuation g. ☐ Message #7, Other _____
d. ☐ Message #4, All Clear h. ☐ No Message Recommended

*9. Release Information: (check one)

- a. ☐ No release has occurred, and **NO** potential for release exists
b. ☐ No release has occurred, however **potential** for release exists
c. ☐ Release is occurring. (circle one) Onsite only / Off-site
d. ☐ Release occurred, but has stopped

*10. Material Released: _____

11. Type of Release: (check one) a. ☐ Surface b. ☐ Water c. ☐ Air d. ☐ Other: _____

12. Estimate of Release Quantity: _____ Time/Duration of Release: _____

13. Meteorological Conditions at PORTS Wind is from the _____ (N,SW,ESE, etc.) at _____ mph. Stability Class is _____

14. Emergency Notification Information Approved by _____ Date: _____ Time: _____
(circle one) CM or PSS (Telecon)

***Items must be completed for initial notification**

EMERGENCY NOTIFICATION FORM

Form A-3138 (12/13/05) Page 2 of 2

Agency	Telephone	Contacted by FAX	Person Contacted	Date/Time
Pike County Sheriff's Office	(740) 947-2111, Press <input type="checkbox"/> 1" Fax (740) 947-1049	Yes: _____ No: _____		
Ohio Emergency Management Agency	(614) 889-7150 Fax (614) 889-7183	Yes: _____ No: _____		
DOE Oak Ridge Operations Center, after calls to state and locals	(865) 576-1005 Fax (865) 576-9772	Yes: _____ No: _____		
NRC Operations Center, after calls to state and locals and within 1 hour of classification	(301) 816-5100 (301) 951-0550 (301) 415-0550 Fax (301) 816-5151	Yes: _____ No: _____		

USEC Headquarters notification: Begin with first listed name on USEC Notification List until a contact is made.

Person Contacted:

Date/Time:

Name	Office Phone	Home Phone	Cellular Phone
Russ Starkey	(301) 564-3459	Non-responsive	Non-responsive
Bob VanNamen	(301) 564-3312		
John Welch	(301) 564-3300		

NOTIFY THE FOLLOWING AGENCIES AS REQUIRED

Agency	Telephone	Contacted by FAX	Person Contacted	Date/Time
If a hazardous or toxic release at PORTS has, or may affect Scioto County, notify within 15 minutes from time of discovery:				
Scioto County LEPC and Scioto County EMA	(740) 354-7566 Fax (740) 355-8237	Yes _____ No _____		
If the facility has a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health or the environment, immediately notify				
Ohio EPA	(800) 282-9378 Fax (614) 644-3250	Yes _____ No _____		
If a release of a chemical or toxic substance in excess of the reportable quantities established under CERCLA section 102, notify within 30 minutes from time of discovery				
Ohio EPA	(800) 282-9378 Fax (614) 644-3250	Yes _____ No _____		
National Response Center	(800) 424-8802	Not Applicable		
If the event results in a single fatality or offsite hospitalization to three (3) or more individuals, notify within 8 hours from time of discovery				
OSHA	(800) 321-6742 Fax (513) 841-4114	Yes _____ No _____		

NOTE: ALWAYS VERIFY AGENCY FAX NUMBER WITH CONTACT BEFORE TRANSMITTING INFORMATION

The mailing address for all correspondence is.

U.S. Department of Energy
Rachel Blumenfeld, Chief Operating Officer
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

The primary contact for hazardous waste storage activities at PORTS is:

LATA/Parallax Portsmouth LLC
Attention: Paul Kreitz, Project Manager
Environmental Management and Enrichment Facilities
P O. Box 855
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to Bechtel Jacobs Company LLC from USEC through a service agreement incorporated into the lease.

Location and Site Plan

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on 3,714.01 federally-owned acres. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1)

PORTS is a Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product requires the use of numerous hazardous chemicals.

Employment at this facility is approximately 1750-2200.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 and X-7725 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

Planning Area

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

This area is the two-mile immediate notification area (INA), within a two-mile radius of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

SUBMISSION DATE: July 13, 2001

No schools are located within the immediate notification area. However, county school buses frequently travel roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

Land Use

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

Transportation Routes

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

Hazardous Waste Storage

Buildings described in this plan are depicted on Figure G-1. DOE operates two Resource Conservation and Recovery Act (RCRA) hazardous waste storage units:

- X-326 Container Storage Unit
- X-7725 Container Storage Unit

X-326 Container Storage Unit

The X-326 Storage Unit is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are six areas of the building, totaling approximately 31,888 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The X-326 Storage Unit is intended for the storage of high assay uranium-bearing hazardous and/or polychlorinated biphenyl wastes until further processing for uranium recovery or treatment through a permitted process is obtained. The wastes will include aqueous laboratory solutions, spent laboratory solvents and decontamination solutions from other buildings on plantsite. All containers will be constructed to Department of Transportation (DOT) specifications where available. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes.

The X-326 Storage Unit was designed and intended for the storage of high assay uranium bearing wastes until further processing for uranium recovery or treatment through a permitted process, such as a National Pollutant Discharge Elimination System-permitted discharge. The wastes that may be stored in the X-326 Storage Unit include aqueous laboratory solutions, spent laboratory solvents, and decontamination solutions from several other buildings on the plantsite.

Wastes stored in the X-326 Storage Unit may include
D001 - Ignitables
D002 - Corrosive (acid and alkaline)
D004-D043 - TC Characteristic
F001, F002
F003, F005
Radioactive RCRA Wastes

SUBMISSION DATE: February 6, 2006

2. Dial 911 on any plant phone and report to answering party;
3. Pick up red emergency phone (in selected areas); or,
4. Dial 3025 for the Plant Shift Superintendent.
5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Department arrives; then provide details.
6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.
 - C. Use of water or water and chemical fire suppressant could result in contaminated runoff
2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.
 - A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard
 - B. The spill could cause the release of toxic liquids or fumes
 - C. The spill can be contained onsite, but the potential exists for groundwater contamination
 - D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health or the environment, he will report his findings as follows:

1. To local authorities if an evacuation offsite is requested, and must be available for their consultation
2. To government officials or the National Response Center (using 800/424-8802) and include
 - A. Name and phone number of reporter,
 - B. Name and address of facility,
 - C. Time and type of incident,
 - D. Name and quantity of material(s) involved, to the extent known;
 - E. The extent of injuries, if any; and
 - F. The possible hazards to human health, or the environment, outside the facility

3. To Ohio Emergency Response Team at 800/282-9378.

G-4 Emergency Response Procedures [OAC 3745-54-52 (A)]

The PORTS USEC Emergency Response Organization is prepared to respond by agreement to emergencies involving DOE facilities or requiring DOE assistance. The Emergency Response Organization is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers, public health and safety, and the environment.

The Emergency Response Organization is staffed with trained personnel who are required to participate in formal training, drills and exercises and respond if notified of an incident. The incident type and severity dictate the level of Emergency Response Organization activation.

The Emergency Response Organization has the following specific functions and responsibilities depending on the incident and level of response needed to mitigate the problem: event categorization, determination of emergency class, notification, provision of protective action recommendations, management and decision making, control of onsite emergency activities, consequence assessment, protective actions, medical support, public information, activation and coordination of onsite response resources, security, communications, administrative support and coordination and liaison with offsite support and response organizations.

Field Response

The Plant Shift Superintendent is delegated the responsibility by PORTS Environmental Management & Enrichment Facilities Site Manager to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The Incident Command System (ICS) is used by PORTS response for managing an incident at the scene. The Incident Command System provides a standard system for responding to all types of incidents. The two major functions of the Incident Command System are safety and efficiency. The system consists of personnel, facilities, equipment, communications and procedures operating within an organized structure to accomplish control of the incident.

When the Plant Shift Superintendent responds to the incident scene and takes charge, the Plant Shift Superintendent becomes the Incident Commander. The Incident Commander establishes a command post at a safe distance away from the incident scene in an upwind direction. All requested field response units report to the command post and receive directions from the Incident Commander for response actions.

All emergency personnel should be provided with as much information as possible, concerning the nature and hazards of the incident they are responding to. This information should include wind direction and speed, possible location of the Command Post, and any areas to avoid. Any changes in the conditions at the incident scene must be passed quickly to all responders.

The Plant Shift Superintendent/Incident Commander is located in the X-300 Plant Control Facility (PCF) which serves as the 24-hour point of contact for all emergency notifications. The Plant Shift Superintendent/Incident Commander

- Provides continuous site-wide emergency direction;
- Directs the effort to respond to an incident;
- Assesses the incident and makes initial categorization/classification;
- Alerts and mobilizes sufficient response forces, including technical assistance, to respond to the requirements of the emergency;
- Directs plant or facility shutdown if necessary in accordance with existing plans and procedures, and
- Ensures communications with the Emergency Operations Center (EOC), when appropriate
- Emergency responders who routinely report to the Command Post include:



OH 7890008983

LPP/ESH&Q-05-098
November 17, 2005

Distribution

**Contract DE-AC24-05OH20192: Class 1 Resource Conservation Recovery Act
Notification – OAC 3745-50-51**

The purpose of this letter is to provide notice in accordance with OAC 3745-50-51 of the following Class 1 modifications to the Resource Conservation Recovery Act Part B Permit (04-66-0680) at the Portsmouth Gaseous Diffusion Plant. The Class 1 modifications addressed the following permit changes:

- Extended the permit for an additional 5 years
- Address change in the Contingency Plan for the emergency coordinator

If there are any questions regarding this notification, please contact Rosemary Richmond at (740) 897-2967.

Sincerely,

Gail G. Mattson, P.E.
Project Manager

GGM:RR:jmb

cc: Rachel Blumenfeld, PPPO/LEX
Susan Brechbill, LPP
Dave Kent, LPP
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/PORTS
File-ESH&Q
File- LPP RMDC-RC



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

NOV 02 2005

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-03-020-06

Dear Mr. Koncelik:

CLASS 1 HAZARDOUS WASTE PERMIT MODIFICATION- PERMIT NO. 04-66-0680/OH7890008983

Please find enclosed a Class 1 modification (not requiring the Director's prior approval) to the Department of Energy Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B Permit). The modification updates the address of the primary Emergency Coordinator in Table G-1 of Section G (Contingency Plan), page G-25.

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D).
- Strike-out and clean copy replacement page G-25 for Section G, Contingency Plan, of the permit renewal application.

The DOE appreciates the Ohio Environmental Protection Agency's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:

P. Allen, OEPA/Columbus
H. Croke, OEPA/Region V
M. Stewart, OEPA/Logan
M. Rafferty, PPPO/PORTS
G. Mattson, LPP/PORTS
Administrative Records

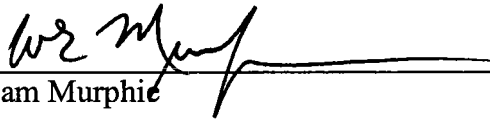
cc w/o enclosures:

R. Blumenfeld, PPPO/LEX
R. Miskelley, PPPO/LEX



Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William Murphy
Manager
Department of Energy
Portsmouth/Paducah Project Office

11/2/05
Date



Gail Mattson
Project Manager
LATA/Parallax Portsmouth, LLC

10-28-05
Date

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
David Kent	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.).
pH meter	1	X-7725	Used to identify pH of material.
Large spill cart	4	X-7725	For moving spill control materials (absorbent, PPE, etc.).
Sprinkler systems	21	X-7725	Capable of controlling fires by water flow.
Fire extinguishers	~200	X-7725	For use in extinguishing Class A, B, or C fires.
Public address system	1	X-7725	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-7725	Allows two-way communications between employees, emergency response organization, etc.
Commercial telephones	> 10	X-7725	Capable of notifying on-site employees and off-site agencies.
Drum pumps	2	X-7725	Liquid waste transfer.
Shovels, mops, buckets, etc.	1	X-7725	Spill clean-up.

**Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)**

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
David Kent	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

Table G-2 Site Emergency Equipment

Equipment Description	Amount	Location	Purpose
Sprinkler systems	~ 80	X-326	Capable of controlling fires by water flow.
Fire extinguishers	~ 350	X-326	For use in extinguishing Class A, B, or C fires.
Building horns	> 10	X-326	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-326	Allows two way communications between employees, emergency response organizations, etc.
Commercial telephones	> 6	X-326	Capable of notifying on-site employees and off-site agencies.
Towels, mops, buckets, etc.	1	X-326	Spill clean-up.
Drum pump	1	X-326	Liquid waste transfer.
Large spill cabinet	1	X-326	For spill control materials (absorbent, PPE, etc.).
pH meter	1	X-7725	Used to identify pH of material.
Large spill cart	4	X-7725	For moving spill control materials (absorbent, PPE, etc.).
Sprinkler systems	21	X-7725	Capable of controlling fires by water flow.
Fire extinguishers	~200	X-7725	For use in extinguishing Class A, B, or C fires.
Public address system	1	X-7725	For activating the Emergency Response Organization, alerting employees to respond according to the nature of the emergency.
Plant radio frequencies	5	X-7725	Allows two-way communications between employees, emergency response organization, etc.
Commercial telephones	> 10	X-7725	Capable of notifying on-site employees and off-site agencies.
Drum pumps	2	X-7725	Liquid waste transfer.
Shovels, mops, buckets, etc.	1	X-7725	Spill clean-up.



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

818
RECEIVED

AUG 24 2005

Technical Support and Permits Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5

23 AUG 2005

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-3-398-05

Dear Mr. Koncelik:

**CLASS 1A RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PART B
PERMIT MODIFICATION - DEPARTMENT OF ENERGY/PORTSMOUTH GASEOUS
DIFFUSION PLANT 04-66-0680/OH7890008983**

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1A modification to the DOE Portsmouth Gaseous Diffusion Plant RCRA Part B Permit. This permit modification will extend the permit for five years beyond the current permit expiration date. This extended period is allowable under Ohio Administrative Code Rule 3745-50-54.

The following items are included in this submittal:

- Certification statement as required by Ohio Administrative Code Rule 3745-50-42(D)
- Replacement page (3 of 31) for the General Permit Conditions
- Overstrike page (3 of 31) delineating the change made to the General Permit Conditions (i.e., deleted text is marked by overstrike; inserted text is denoted by capitalized text)

The overstrike page is provided solely to aid the Ohio Environmental Protection Agency (OEPA) in identifying the proposed change to the permit. The replacement page is a clean copy (i.e., overstrike text has been deleted and capitalized text has been changed to upper/lower case as appropriate). The clean copy replacement page should be inserted in the permit.

DOE appreciates OEPA's efforts in working with us to maintain the site's RCRA Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty of my staff at 740-897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Murphie', with a long horizontal flourish extending to the right.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

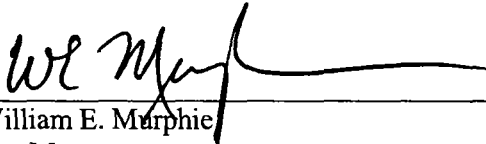
Enclosures

cc w/enclosures:

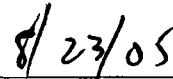
H. Croke, U.S. EPA/Region 5
J. Michnowicz, OEPA/Logan
P. Allen, OEPA/Columbus (2 copies)
G. Mattson, LPP/PORTS
Administrative Records

Certification Statement

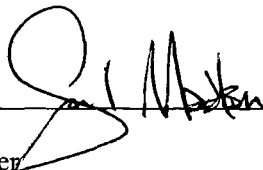
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



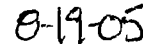
William E. Murphy
Site Manager
Department of Energy
Portsmouth Site Office



Date



Gail Mattson
Project Manager
LATA/Parallax Portsmouth LLC



Date

Please insert in Module A- General Permit Conditions
(clean-copy replacement page)

A.3. Permit Effective/Expiration Date
OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is ten years after the date of journalization of this permit.

A.4. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5. Duty to Comply
OAC Rule 3745-50-58(A)

The Permittee shall comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted there under and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

A.6. Duty to Reapply and Permit Expiration
OAC Rules 3745-50-40(E); 3745-50-58(B); 3745-50-56 and ORC Section 734.05(H)

- (a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days before the expiration date of this permit or upon approval of the director a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittals
- (b) The Permittee may continue to operate in accordance with the terms and condition of the expired permit until a renewal permit is issued or denied if:

Module A- General Permit Conditions

(strike-through page to identify changes)

A.3. Permit Effective/Expiration Date
OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is ~~five~~ TEN years after the date of journalization of this permit.

A.4. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5. Duty to Comply
OAC Rule 3745-50-58(A)

The Permittee shall comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted there under and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

A.6. Duty to Reapply and Permit Expiration
OAC Rules 3745-50-40(E); 3745-50-58(B); 3745-50-56 and ORC Section 734.05(H)

- (a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days before the expiration date of this permit or upon approval of the director a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittals
- (b) The Permittee may continue to operate in accordance with the terms and condition of the expired permit until a renewal permit is issued or denied if:



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

JUN 24 2005

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-03-361-05

Dear Mr. Koncelik:

**RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT
04-66-0680/OH7890008983; MODIFICATION REQUEST**

The purpose of this letter is to request approval of the enclosed Class 1A Modification to the Resource Conservation and Recovery Act (RCRA) Part B Permit for the Portsmouth Gaseous Diffusion Plant.

Specifically, this modification will remove Area C of the X-7725 Unit from the permit. This area has been closed in accordance with the RCRA Part B Permit, Volume 4, Appendix I-2 Closure Plan for the X-7725 Unit. An Independent Engineer's Certification for the closure of this area is being provided under a separate cover letter (PPPO-03-360-05) as required by the Closure Plan. As mentioned in previous correspondence on this matter, this area has been closed so that these portions of the X-7725 may be leased by the United States Enrichment Corporation (USEC) for the American Centrifuge Facility.

Both overstrike and replacement pages are included in this submittal. The overstrike pages are provided solely to aid the Ohio Environmental Protection Agency (OEPA) in identifying changes to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstrike language has been removed and text in all capitals has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application. A clean copy of the entire Section D of the permit application has been provided because of the number of changes to Section D. The clean copy replacement pages have the page header "SUBMISSION DATE: June 15, 2005". Please note that because the permit application is printed double-sided, pages that have not been changed will bear a different submission date.

The following items are included in this request:

- Certification statement as required by Ohio Administrative Code 3745-50-42(D)
- Strike out pages for the RCRA Part B Permit
- Replacement pages for the RCRA Part B Permit
- Modified and additional drawings

OEPA assistance in providing prompt review and approval of this modification is requested. These modifications have been classified as Class 1A (reference letter Steven Skinner, OEPA to William E. Murphie, U.S. DOE - January 29, 2004).

If you have any questions or need additional information, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,



William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:

H. Croke, USEPA/ Region 5
P. Allen, OEPA/Columbus
J. Michnowicz, OEPA/SEDO
Administrative Records

cc w/o enclosure:

R. Blumenfeld, PPPO/LEX
J. Meersman, BJC/PORTS
G. Mattson, LPP/PORTS

815



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

RECEIVED

MAY 27 2005

JUN 06 2005

Technical Support and Permits Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5
PPP-05-34

Mr. Joseph Koncelik, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

Dear Mr. Koncelik:

**CLASS 3 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PART B
PERMIT MODIFICATION DEPARTMENT OF ENERGY/PORTSMOUTH GASEOUS
DIFFUSION PLANT 04-66-0680/OH7890008983**

The U.S. Department of Energy (DOE) is requesting the enclosed Class 3 modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The modification changes the operator of the facility from the Bechtel Jacobs Company LLC to LATA/Parallax Portsmouth, LLC (LPP). The DOE remains the owner and co-operator of the facility.

The following items are included with this submittal:

- A table identifying the changes made to the permit renewal application
- Strike-through pages that identify the proposed changes to the permit renewal application
- Clean-copy replacement pages for the permit renewal application
- A certification statement as required by Ohio Administrative Code (OAC) 3745-50-42(D) (included as Section N in the clean-copy replacement pages)
- LATA/Parallax Portsmouth, LLC Compliance History
- Temporary Authorization Request

The DOE appreciated the Ohio Environmental Protection Agency's efforts in working with us to maintain the facility's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Murphie", is written over a horizontal line.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosure

MAY 27 2005

Mr. Koncelik

-2-

PPPO-03-341-05

cc w/enclosures:

R. Blumenfeld, PPPO/LEX

H. Croke, USEPA/ Region 5

P. Allen, OEPA/Columbus

J. Michnowicz, OEPA/SEDO

M. Stewart, OEPA/SEDO

J. Meersman, BJC/PORTS

G. Mattson, LATA/Parallax

D. Kent, LATA/Parallax

C. Sheward, Theta Pro2Serve/PORTS

Administrative Records



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

RECEIVED

MAR 02 2005

APR 07 2005
PPPO-30286405

Mr. Joseph Koneclic, Director
Ohio Environmental Protection Agency
122 South Front Street
Columbus, Ohio 43216

Technical Support and Permits Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5

Dear Mr. Koneclic:

**DEPARTMENT OF ENERGY/PORTSMOUTH GASEOUS DIFFUSION PLANT RCRA PART B
PERMIT NO: 04-66-0680/OH7890008983 – CLASS 1 MODIFICATION**

The U.S. Department of Energy (DOE) provides notice of the enclosed Class 1 modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The modification updates the Emergency Coordinators in Table G-1 of Section G (Contingency Plan), page G-25. The modification is a Class 1 modification that does not require prior written approval from the Director, in accordance with Ohio Administrative Code 3745-50-51 (Appendix., C.6.d). An additional emergency coordinator, Keith Vanderpool, has been added by the United States Enrichment Corporation (USEC).

The following items are included in this submittal:

Certification statement as required by OAC 3745-50-42(D)
Replacement page for Section G, Contingency Plan, of the permit renewal application

DOE appreciates the Ohio Environmental Protection Agency's (OEPA) efforts in working with us to maintain the site's Part B Permit.

If you have any questions or need additional information, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,

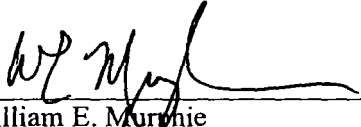
William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:
Harriet Croke, U.S. EPA/Region 5
Pam Allen, Ohio EPA/Columbus
Jim Michnovich, Ohio EPA/Logan
Melody Stewart, Ohio EPA/Logan
John Meersman, BJC/PORTS
Administrative Records, BJC/PORTS
R. Blumenfeld, PPPO/LEX

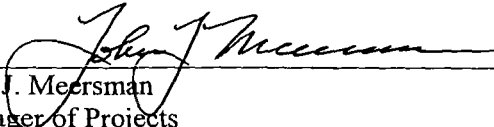
Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office

Date 2/28/05



John J. Meersman
Manager of Projects
Bechtel Jacobs Company LLC

Date 2/17/05

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Lewis C. Goidell	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Williamson	Non-responsive	Non-responsive	Non-responsive
Ron P. Crabtree			
Gary Salyers			
Kurt Sisier			
Stephen W. May			
Eric (Rudy) Spaeth			
Keith Vanderpool			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

SUBMISSION DATE: July 13, 2001

Table G-2 Site Emergency Equipment

EQUIPMENT DESCRIPTION	AMOUNT	LOCATION	PURPOSE
SPRINKLER SYSTEMS	≈80	X-326	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈350	X-326	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
BUILDING HORNS	>10	X-326	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-326	ALLOWS TWO WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATIONS, ETC.
COMMERCIAL TELEPHONES	>6	X-326	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
TOWELS, MOPS, BUCKETS, ETC.	1	X-326	SPILL CLEAN-UP
DRUM PUMP	1	X-326	LIQUID WASTE TRANSFER
LARGE SPILL CABINET	1	X-326	FOR SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
PH METER	1	X-7725	USED TO IDENTIFY PH OF MATERIAL
LARGE SPILL CART	4	X-7725	FOR MOVING SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
SPRINKLER SYSTEMS	21	X-7725	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈200	X-7725	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
PUBLIC ADDRESS SYSTEM	1	X-7725	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
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SHOVELS, MOPS, BUCKETS, ETC.	1	X-7725	SPILL CLEAN-UP



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

NOV 05 2004

Ms. Melody Stewart
Ohio Environment Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

PPPO-01-646-04

Dear Ms. Stewart:

**CLASS 1 RCRA PART B PERMIT MODIFICATION, DEPARTMENT OF ENERGY
PORTSMOUTH GASEOUS DIFFUSION PLANT, 04-66-0680/OH7890008983**

Pursuant to Ohio Administrative Code (OAC) 3745-50-51, this letter serves as notice of the enclosed Class 1 modification to the Department of Energy (DOE) Portsmouth Gaseous Diffusion Plant (PGDP) Hazardous Waste (Part B) Permit. The modification updates mailing addresses and contact information for DOE and Bechtel Jacobs Company LLC (BJC) (page G-3) and adds an additional Emergency Coordinator in Table G-1 of Section G (Contingency Plan), page G-25 (modification C.6.d as provided in the Appendix to OAC 3745-50-51).

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application
- Overstrike pages corresponding to the replacement pages that delineate the changes made to the permit renewal application

Both overstrike pages and replacement pages are included in this submittal. The overstrike pages are provided solely to aid the Ohio Environmental Protection Agency (OEPA) in identifying the changes made to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstruck language has been removed and capitalized text has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application. Replacement pages that have changed have the page header: "SUBMISSION DATE: November 5, 2004. Please note that because the permit application is printed double-sided, pages that have not been changed still bear the original and/or previous submission date.

1000 1000 1000

DOE appreciates the OEPA's efforts in working with us to maintain the site's Part B Permit. If you have questions or need additional information, please contact Rachel Blumenfeld at (859) 219 4002.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. E. Murphie', with a long horizontal flourish extending to the right.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:

H. Croke, US-EPA/Region 5


P. Allen, OEPA/Columbus

J. Meersman, BJC/PORTS

Administrative Records

Certification Statement

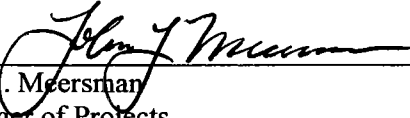
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



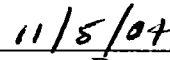
William E. Murphy, Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy



Date



John I. Meersman
Manager of Projects
Bechtel Jacobs Company LLC



Date

Please insert in Volume 1, Text, Section G, Contingency Plan
(clean-copy replacement page)

The mailing address for all correspondence is:

U.S. Department of Energy
Rachel Blumenfeld, Chief Operating Officer
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

The primary contact for hazardous waste storage activities at PORTS is:

Bechtel Jacobs Company LLC
John J. Meersman, Manager of Projects
P.O. Box 900
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to Bechtel Jacobs Company LLC from USEC through a service agreement incorporated into the lease.

Location and Site Plan

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on 3,714.01 federally-owned acres. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product requires the use of numerous hazardous chemicals.

Employment at this facility is approximately 1750-2200.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 and X-7725 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

Planning Area

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

This area is the two-mile immediate notification area (INA), within a two-mile radius of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

SUBMISSION DATE: July 13, 2001

No schools are located within the immediate notification area. However, county school buses frequently travel a roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

Land Use

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

Transportation Routes

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

Hazardous Waste Storage

Buildings described in this plan are depicted on Figure G-1. DOE operates two Resource Conservation and Recovery Act (RCRA) hazardous waste storage units:

- X-326 Container Storage Unit
- X-7725 Container Storage Unit

X-326 Container Storage Unit

The X-326 Storage Unit is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are six areas of the building, totaling approximately 31,888 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The X-326 Storage Unit is intended for the storage of high assay uranium-bearing hazardous and/or polychlorinated biphenyl wastes until further processing for uranium recovery or treatment through a permitted process is obtained. The wastes will include aqueous laboratory solutions, spent laboratory solvents and decontamination solutions from other buildings on plantsite. All containers will be constructed to Department of Transportation (DOT) specifications where available. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes.

The X-326 Storage Unit was designed and intended for the storage of high assay uranium bearing wastes until further processing for uranium recovery or treatment through a permitted process, such as a National Pollutant Discharge Elimination System-permitted discharge. The wastes that may be stored in the X-326 Storage Unit include aqueous laboratory solutions, spent laboratory solvents, and decontamination solutions from several other buildings on the plantsite.

Wastes stored in the X-326 Storage Unit may include:

- D001 - Ignitables
- D002 - Corrosive (acid and alkaline)
- D004-D043 - TC Characteristic
- F001, F002
- F003, F005
- Radioactive RCRA Wastes

Table G-1
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(Plant Shift Superintendents)

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Gary Salyers			
Kurt Sisler			
Stephen W. May			
Eric (Rudy) Spaeth			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

Table G-2 Site Emergency Equipment

EQUIPMENT DESCRIPTION	QUANTITY	LOCATION	USE
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Section G, Contingency Plan
(strike-through page to identify changes)

The mailing address for all correspondence is:

U. S. Department of Energy
~~Portsmouth Site Office~~
Attention: ~~Melda J. Rafferty~~
~~P.O. Box 700~~
~~Piketon, OH 45661~~
RACHEL BLUMENFELD, CHIEF OPERATING OFFICER
PORTSMOUTH/PADUCAH PROJECT OFFICE
1017 MAJESTIC DRIVE, SUITE 200
LEXINGTON, KY 40513

The primary contact for hazardous waste storage activities at PORTS is:

Bechtel Jacobs Company LLC
Attention: ~~Gilbert D. Drexel~~ JOHN J. MEERSMAN, Manager of Projects
P.O. Box 900
Piketon, OH 45661

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OH7890008983

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SUBMISSION DATE: July 13, 2001

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Gary Salyers			
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ERIC (RUDY) SPAETH			

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State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

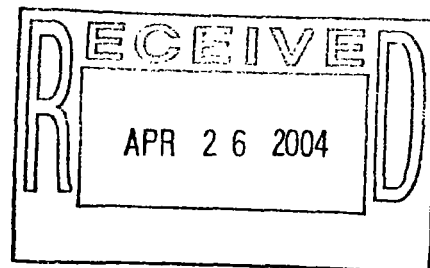
CERTIFIED MAIL 7002 2410 0001 1303 0257

APR 26 AM 11:02

April 14, 2004

**Re: Portsmouth Gaseous Diffusion Plant
Hazardous Waste Permit Modification
Class 1 Acknowledgment
U.S. DOE - Portsmouth
OH7890008983 / 04-57-0680**

William E. Murphie
Oak Ridge Operations
P.O. Box 1410
Paducah, KY 42001



Dear Mr. Murphie:

On March 17, 2004, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number-040317-1A-1) from U.S. DOE Portsmouth Gaseous Diffusion Plant. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51.

FOR APPROVAL

The following modification has been made to your March 15, 2001, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

Revisions to the Closure Plan for X-7725 which will allow partial closures within this unit.

Attached is a copy of the permit application revisions. This has been included to ensure that all involved parties have written confirmation of the changes*.

Non Record Copy



Printed on Recycled Paper

Ohio EPA is an Equal Opportunity Employer

U.S. DOE Portsmouth Gaseous Diffusion Plant
Class 1A Approval
Page 2 of 2

If you have any questions concerning this action, please contact Melody Stewart at the Ohio EPA Southeast District office at 740-380-5256.

Sincerely,

Steven C. Skinner

Steven C. Skinner, Chief
Southeast District Office

MS:sb

cc: Pamela Allen, Manager, RIS, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Melody Stewart, DHWM, SEDO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), [Facility Name] shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2980, or by e-mail at pamela.allen@epa.state.oh.us.

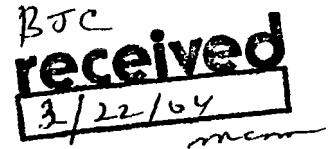
*Rosemary Richmond
Sandy Childers
Tom Marshall
Lew Gindill
Mary Clair Hayden
Ralph D'Antoni*



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

6490040166



March 16, 2004

Ohio EPA – Division of Hazardous Waste Management
ATTN: Pamela S. Allen, Manager
Regulatory & Information Services Section
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

PPPO-01-519-04

Ohio EPA – Division of Hazardous Waste Management
Southeast District Office
ATTN: Jim Michnowicz, Supervisor
2195 Front Street
Logan, Ohio 43138

Ms. Allen and Mr. Michnowicz:

**REQUEST FOR MODIFICATION OF RESOURCE CONSERVATION AND
RECOVERY ACT PART B PERMIT CLOSURE PLAN – RCRA PART B
PERMIT, 04-66-0680/oh78900008983**

The U.S. Department of Energy (Doe) AND Bechtel Jacobs Company LLC (BJC) (as co-signatures on the permit) are requesting to modify the Resource Conservation and Recovery Act (RCRA) Part B Permit for the Portsmouth Gaseous Diffusion Plant. Specifically, this modification will allow for the partial closure of the X-7725 Unit. The current closure plan states that there will be no partial closures of this unit. Partial closure of the X-7725 Unit is necessary to allow for the United States Enrichment Corporation to lease portions of the X-7725 Unit for installation of the American Centrifuge facility, a new uranium enrichment facility. An application will be submitted at a later date to remove the closed portions of the X-7725 Unit from the permit. These modification have been classified as Class 1A (reference letter Steven Skinner, Ohio EPA to William E. Murphie, U.S. DOE – January 29, 2004).

The following items are included in this request:

- Certification statement as required by Ohio Administrative Code 3745-50-42(D)
- Strike-out pages for the RCRA Part B Permit Closure Plan
- Replacement pages for the RCRA Part B Permit Closure Plan
- Partial closure schedule

cc: Rosemary Richmond
Sandy Childers

If you have any questions or need additional information, please contact me at (859) 219-4000.

Sincerely,

A handwritten signature in dark ink, appearing to read 'W. Murphie', with a long horizontal flourish extending to the right.

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures: As stated

cc w/encl:

H. Croke, USEPA/Region 5

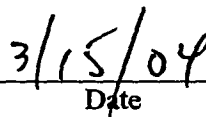
G. Drexel, BJC/PORTS

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office



Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC



Date

**Volume 4, Appendix I-2,
Closure Plan for the X-7725 Storage Unit**

(strike-out pages that indicate proposed changes to the Closure Plan)

2. CLOSURE PROCEDURES

The closure described in this plan is intended to minimize the need for further maintenance. It eliminates -- to the extent necessary to protect human health and the environment -- post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. Closure will be accomplished by the removal of waste and decontamination of the X-7725 Storage Unit floors, curbing and associated surfaces.

2.1 Estimate of the Quantity of Inventory to be Removed

The maximum capacity of the X-7725 Storage is summarized in Table 3. Waste stored in the X-7725 Storage Unit are discussed in Section 1.3.1.

2.2 Procedures for Handling Removed Inventory

All wastes at the facility will either undergo on-site treatment to render wastes nonhazardous and remain on-site, BE MOVED TO ANOTHER ON-SITE PERMITTED STORAGE AREA, or be disposed at a facility permitted to receive waste (e.g., RCRA TSDF, TSCA incinerator). All wastes will be disposed in strict compliance with all applicable environmental regulations. Any wastes removed from the facility for disposal will be removed in an acceptable manner to transportation vehicles appropriate for waste transport. All transportation will take place via hazardous waste transporters registered with the Public Utilities Commission of Ohio and U.S. EPA and possessing a registration number from each of these entities. All waste disposed will be manifested using the uniform hazardous waste manifest (U.S. EPA form 8700-22 and 8700-22A) in accordance with Ohio Administrative Code 3745-52-20 before transportation off-site.

2.3 Procedures for Decontamination and Disposal

2.3.1 Surface Decontamination

The X-7725 Storage Unit storage area surfaces consist of urethane painted/coated concrete surfaces and associated diking. The urethane material is extremely resistant to chipping and cracking. Structural joints are filled with a caulking which is also extremely resistant to cracking.

Each of the twenty-two storage areas of the X-7725 Storage Unit will be decontaminated as discussed. Initially, those areas where PCB and PCB-contaminated waste were stored will be sampled for PCBs to determine if PCB contamination exists. Standard 100 cm² wipe samples will be randomly collected in accordance with 40 CFR 761.125 (PCB Spill Cleanup Policy). Additional samples will be collected from areas that appear stained as identified by a certified professional engineer. Any areas exhibiting PCB contamination above 10 µg/100 cm² (the clean level for PCBs under 40 CFR 761.125) will be decontaminated according to procedures specified in 40 CFR 761.125 before undergoing RCRA decontamination. Upon completion of these procedures, the areas will undergo additional RCRA decontamination procedures.

Prior to decontamination of a storage area, the area will be divided into zones for decontamination verification. Before decontamination procedures begin, a certified professional engineer will

determine the perimeter of the zones based upon visual inspection. Areas of apparent surface staining, contamination or structural faults will be noted for special evaluation in zone and/or sampling consideration. The inner surfaces of the diked outer periphery of the storage areas will be decontaminated. Materials such as sorbent sausages and/or pads will also be placed in areas being decontaminated on the top of the dike, outer surface and outer flooring to protect these areas from splashing that might potentially occur during the decontamination process. To decontaminate the X-7725 Storage Unit, personnel will use a brush, mops, and/or a high pressure hot water spray to wash down the floor. All decontamination procedures will strictly adhere to the health and safety requirements outlined in the X-7725 Storage Unit HASP (Section 4.0). Minimal detergent solutions will be used to facilitate the proposed treatment of any generated liquid waste. As the floor is cleaned, the liquid spray will be collected and placed into containers. The areas where the contaminated material and liquid wastes are transferred to containers will be curbed and overlain with Visqueen plastic or equivalent sheeting to provide spill containment.

Chemical analysis of the final rinseate will be used to determine if sufficient decontamination of the surfaces has taken place. One sample of rinseate will be collected from each of the decontamination zones delineated by the professional engineer. Each sample will be analyzed for the parameters listed in Table 4. The X-7725 Storage Unit surfaces will be considered clean when concentrations of liquid hazardous waste or hazardous waste constituents fall below:

- a) Fifteen times the public drinking water maximum contaminant level (MCL) for hazardous waste constituents as listed in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics provided that fifteen times the MCL is less than or equal to 1 mg/L;
- b) If an MCL is not available for a particular contaminant, then fifteen times the maximum contaminant level goal (MCLG) as listed in 40 CFR 141.50 shall be used as the clean standard provided that fifteen times the MCL is less than or equal to 1 mg/L. If the MCLG is zero, use fifteen times the contaminant's practical quantitation limit (PQL) in groundwater provided that 15 times the PQL is less than or equal to 1 mg/L; and
- c) If the product of fifteen times the MCL or MCLG exceeds 1 mg/l or if neither an MCL nor an MCLG is available for a particular contaminant, 1 mg/l shall be used as the clean standard.

After the surface decontamination is completed, floor joints, if any, will be visually inspected for their integrity and tested for contamination under the supervision of a certified professional engineer. Those joint areas that exhibit the poorest integrity and visual contamination will be randomly sampled to verify no contamination. A total of five rinseate samples from the selected floor joint areas will be randomly collected and analyzed for those constituents in Table 4.

3. CLOSURE SCHEDULE

3.1 Expected Year of Closure

The X-7725 Storage Unit is expected to undergo closure in the year 2041 upon notification of intent to close according to the schedule outlined in Table 6.

3.2 Frequency of Partial Closure

~~There will be no partial closure for the X-7725 Storage Unit.~~ PARTIAL CLOSURE OF ONE OR MORE OF THE STORAGE AREAS WITHIN THE X-7725 STORAGE UNIT MAY OCCUR PRIOR TO THE EXPECTED YEAR OF CLOSURE. OHIO EPA WILL BE NOTIFIED OF CLOSURE ACTIVITIES IN ACCORDANCE WITH OAC 3745-55-12.

3.3 Waste Removal

The X-7725 stored hazardous waste will be shipped to a permitted Treatment, Storage, and Disposal (TSD) Facility on a routine basis and will be completed at 90 days after receipt of final volume of hazardous waste, assuming all wastes are characterized and the containers are adequate for shipping. WASTE MAY ALSO BE TRANSFERRED TO AN ON-SITE PERMITTED STORAGE AREA. Organic waste will be disposed in accordance with applicable treatment techniques. Aqueous inorganic mixed waste may be treated on-site to allow low-level radioactive waste disposal. Any remaining waste at the time of closure will be removed accordingly. The schedule for waste removal is illustrated in Table 6. Waste removal ~~will begin in the year 2041 and~~ will be completed 90 days after the start of removal.

3.4 Closure Completion

Closure is expected to be completed within 180 days of beginning closure under an Ohio EPA approved plan. Although no time extension requests are anticipated, if one should become necessary, it will be requested in accordance with demonstration requirements specified in OAC 3745-66-13.

3.5 Certification of Closure

Within 60 days of successful completion of the prescribed closure, the Department of Energy will submit to the Director of the Ohio EPA, by registered mail, a certification that the X-7725 unit has been closed in accordance with the specifications in the approved closure plan. In addition, the Regional Administrator, U.S. EPA Region V will be sent a copy. The certification statement will include the exact wording found in OAC 3745-50-42(D). The certification will be signed by the owner and by the Independent Certified Professional Engineer responsible for closure oversight, registered in the State of Ohio.

3.6 Survey Plat

Since the closure of the X-7725 Storage Unit is expected to be "clean," filing a survey plat is not expected to be required. Should it be determined that a clean closure cannot be accomplished, the Department of Energy will immediately contact the Ohio EPA to discuss amending the closure plan.

SUBMISSION DATE: March 5, 2004

If it becomes necessary, a survey plat will be submitted to the Pike County Recorder's Office and the Director of the Ohio EPA, which indicates the location and dimensions of the unit with respect to permanently surveyed benchmarks. The plat would be prepared and certified by a professional land surveyor. The plat would contain a note, prominently displayed, which states the owners obligation to restrict disturbance of the hazardous waste unit.

3.7 Request for Extension to Deadlines for Handling Inventory or Completing Closure

There are no extensions needed at this time.

3.8 Milestones

Table 6 exhibits the time required for each phase of the X-7725 Storage Unit closure. IF PARTIAL CLOSURE IS IMPLEMENTED FOR ANY AREA IN THE X-7725 STORAGE UNIT, A SEPARATE CLOSURE SCHEDULE FOR THE PARTIAL CLOSURE WILL BE SUBMITTED TO OHIO EPA.

**Please insert in Volume 4, Appendix I-2,
Closure Plan for the X-7725 Storage Unit**

(clean copy replacement pages)

Closure Plan for the X-7725 Storage Unit
Portsmouth Gaseous Diffusion Plant

Date Issued — February 21, 2000
Page Revisions — July 11, 2000
Page Revisions — July 13, 2001
Page Revisions — March 5, 2004

Prepared for the
U.S. Department of Energy
Office of Environmental Restoration and Waste Management

BECHTEL JACOBS COMPANY LLC
managing the
Environmental Management Activities at the
Portsmouth Gaseous Diffusion Plant

Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

under contract DE-AC05-98OR22700
for the
U.S. DEPARTMENT OF ENERGY

2. CLOSURE PROCEDURES

The closure described in this plan is intended to minimize the need for further maintenance. It eliminates -- to the extent necessary to protect human health and the environment -- post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere. Closure will be accomplished by the removal of waste and decontamination of the X-7725 Storage Unit floors, curbing and associated surfaces.

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- c) If the product of fifteen times the MCL or MCLG exceeds 1 mg/l or if neither an MCL nor an MCLG is available for a particular contaminant, 1 mg/l shall be used as the clean standard.

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3. CLOSURE SCHEDULE

3.1 Expected Year of Closure

The X-7725 Storage Unit is expected to undergo closure in the year 2041 upon notification of intent to close according to the schedule outlined in Table 6.

3.2 Frequency of Partial Closure

Partial closure of one or more of the storage areas within the X-7725 Storage Unit may occur prior to the expected year of closure. Ohio EPA will be notified of closure activities in accordance with OAC 3745-55-12.

3.3 Waste Removal

The X-7725 stored hazardous waste will be shipped to a permitted Treatment, Storage, and Disposal (TSD) Facility on a routine basis and will be completed at 90 days after receipt of final volume of hazardous waste, assuming all wastes are characterized and the containers are adequate for shipping. Waste may also be transferred to an on-site permitted storage area. Organic waste will be disposed in accordance with applicable treatment techniques. Aqueous inorganic mixed waste may be treated on-site to allow low-level radioactive waste disposal. Any remaining waste at the time of closure will be removed accordingly. The schedule for waste removal is illustrated in Table 6. Waste removal will be completed 90 days after the start of removal.

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Closure is expected to be completed within 180 days of beginning closure under an Ohio EPA approved plan. Although no time extension requests are anticipated, if one should become necessary, it will be requested in accordance with demonstration requirements specified in OAC 3745-66-13.

3.5 Certification of Closure

Within 60 days of successful completion of the prescribed closure, the Department of Energy will submit to the Director of the Ohio EPA, by registered mail, a certification that the X-7725 unit has been closed in accordance with the specifications in the approved closure plan. In addition, the Regional Administrator, U.S. EPA Region V will be sent a copy. The certification statement will include the exact wording found in OAC 3745-50-42(D). The certification will be signed by the owner and by the Independent Certified Professional Engineer responsible for closure oversight, registered in the State of Ohio.

3.6 Survey Plat

Since the closure of the X-7725 Storage Unit is expected to be "clean," filing a survey plat is not expected to be required. Should it be determined that a clean closure cannot be accomplished, the Department of Energy will immediately contact the Ohio EPA to discuss amending the closure plan. If it becomes necessary, a survey plat will be submitted to the Pike County Recorder's Office and the Director of the Ohio EPA, which indicates the location and dimensions of the unit with respect to

SUBMISSION DATE: March 5, 2004

permanently surveyed benchmarks. The plat would be prepared and certified by a professional land surveyor. The plat would contain a note, prominently displayed, which states the owners obligation to restrict disturbance of the hazardous waste unit.

3.7 Request for Extension to Deadlines for Handling Inventory or Completing Closure

There are no extensions needed at this time.

3.8 Milestones

Table 6 exhibits the time required for each phase of the X-7725 Storage Unit closure. If partial closure is implemented for any area in the X-7725 Storage Unit, a separate closure schedule for the partial closure will be submitted to Ohio EPA.



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

Certified Mail 7002 2410 0001 1302 9008

January 29, 2004

**Re: Hazardous Waste Permit Modification
Modification Classification Determination
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983/ 04-66-0680**

William E. Murphie
Portsmouth Gaseous Diffusion Plant
P.O. Box 700
Piketon, Ohio 45661-0700

Dear Mr. Murphie:

On January 16, 2004, Ohio EPA received a request for a determination of a hazardous waste permit modification classification from the Portsmouth Gaseous Diffusion Plant (PGDP). The PGDP is wanting to close portions of the X-7725 hazardous waste management area and to remove these closed portions from the existing permit.

The Portsmouth Gaseous Diffusion Plant is hereby notified that Ohio EPA has classified the above referenced modification determination request as a Class 1A permit modification pursuant to Ohio Administrative Code ("OAC") Rule 3745-50-51(E). Be advised that this classification determination does not automatically begin the administrative permit modification process. The Portsmouth Gaseous Diffusion Plant must follow the procedures outlined in OAC Rule 3745-50-51(D) to begin the administrative permit modification process.

Questions concerning this permit modification classification should be directed to Melody Stewart at Ohio EPA's Southeast District Office.

Sincerely,

Steven C. Skinner, P.E.
District Chief
Southeast District Office

SCS:sb:jg

cc: Pamela Allen, ITTSS, DHWM, CO
Jeremy Carroll, Engineering Unit, DHWM, CO
Melody Stewart, DHWM, SEDO
Jim Michnowicz, Group Leader, DHWM, SEDO



Department of Energy

Oak Ridge Operations
Paducah Site Office
P.O. Box 1410
Paducah, KY 42001

6490030540

OH 890008983

OH 7890 008 112

November 24, 2003
EM-97-0931

NOV 25 2003

Mr. Christopher Jones, Director
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43266-0149

Dear Mr. Jones:

**RESOURCE CONSERVATION AND RECOVERY ACT PART B PERMIT
NUMBER 04-66-0680/OH7890008983 – CLASS 1 MODIFICATION**

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modification (modification C.6.d as provided in the Appendix to Ohio Administrative Code (OAC) Rule 3745-50-51) to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The modification contains revisions to Section G, Contingency Plan, and includes updates to Figure G-3 (existing pages G-31 and G-32) and the emergency agreements in Attachment 1 (existing pages G-39 through G-66).

The following items are included in this submittal:

- Certification statement as required by OAC Rule 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application

Overstrike pages are not provided for Figure G-3 and the renewed emergency agreements (Attachment 1) because these items have been updated in their entirety. These clean-copy replacement pages should be inserted in the permit renewal application.

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:

Harriet Croke, U.S. EPA/Region 5

Pam Allen, Ohio EPA/Columbus

Melody Stewart, OEPA/Logan


✓ Gilbert D. Drexel, BJC/PORTS

Administrative Records

Rosemary Richmond
Sandy Childers
Mary Clair Hayden


Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



William E. Murphy
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office

11/21/03
Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC

11/21/03
Date

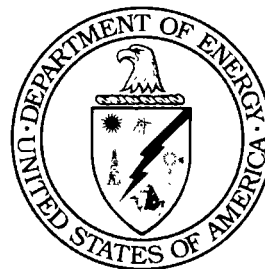
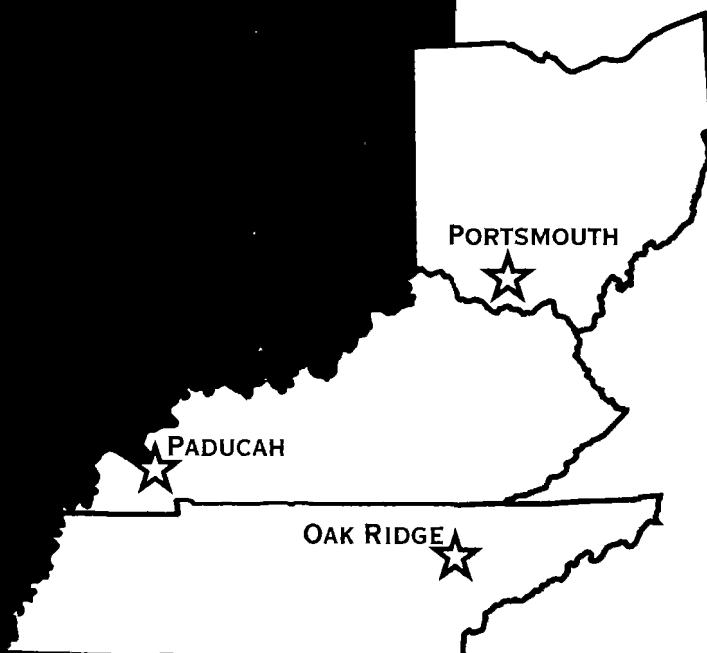
**Please insert in Volume 1, Text, Section G, Contingency Plan
(clean-copy replacement pages)**



BJC/PORTS-35/R4

ENVIRONMENTAL MANAGEMENT
& ENRICHMENT FACILITIES
MANAGEMENT AND INTEGRATION CONTRACT

**Resource Conservation
And Recovery Act (RCRA)
for the Portsmouth
Gaseous Diffusion**



MANAGED BY
BECHTEL JACOBS COMPANY LLC
FOR THE UNITED STATES
DEPARTMENT OF ENERGY

NON CONTROLLED COPY

This document has received the appropriate
reviews for release to the public.

Please insert in Volume 1, Text, Section G, Contingency Plan
(clean-copy replacement pages)

EMERGENCY NOTIFICATION FORM

A-3138 (3/21/03)

Page 1 of 2

"This is the Portsmouth Gaseous Diffusion Plant, located in Piketon, Ohio, with: (check one) ☐ an EMERGENCY notification
(Repeat Line) ☐ a DRILL notification

*1. This is Emergency Notification Number: _____

*2. Portsmouth Plant Communicator Name: _____ Phone Number: 740-897-3025 or 740-897-4019
(PRINT) (circle one)

*3. Emergency Classification: (check one)

- a. ☐ ALERT at _____ hrs.
- b. ☐ SITE AREA EMERGENCY at _____ hrs.
- c. ☐ Terminated at _____ hrs.
- d. ☐ Classification changed at _____ hrs.
- e. ☐ Other: _____

*4. Event Description: _____

*5. Plant Status (impact on plant): (check one)

- a. ☐ Operating
- b. ☐ Shutdown
- c. ☐ Being Shutdown

*6. OFF-SITE Protective Actions Recommended: (check one)

- a. ☐ No protective actions recommended at this time.
- b. ☐ Off-site sheltering recommended within 2-mile Immediate Notification Area.
- c. ☐ Other: _____

*7. Public Warning Siren Activation: (check one)

- a. ☐ Have not been recommended.
- b. ☐ Have been recommended (required for all Site Area Emergencies)

*8. EAS Message Recommended: (check one)

- a. ☐ Message #1, No Actions Required
- b. ☐ Message #2, Sheltering Required
- c. ☐ Message #3, Evacuation
- d. ☐ Message #4, All Clear
- e. ☐ Message #5, Exercise/Drill
- f. ☐ Message #6, Unintentional Siren
- g. ☐ Message #7, Other _____
- h. ☐ No Message Recommended

*9. Release Information: (check one)

- a. ☐ No release has occurred, and NO potential for release exists
- b. ☐ No release has occurred, however potential for release exists
- c. ☐ Release is occurring: (circle one) Onsite only / Off-site
- d. ☐ Release occurred, but has stopped

*10. Material Released: _____

*11. Type of Release: (check one) a. ☐ Surface b. ☐ Water c. ☐ Air d. ☐ Other: _____

*12. Estimate of Release Quantity: _____ Time/Duration of Release: _____

*13. Meteorological Conditions at PORTS: Wind is from the _____ (N, SW, ESE, etc.) at _____ mph. Stability Class is _____

*14. Emergency Notification Information Approved by: _____ Date: _____ Time: _____
(circle one) CM or PSS

*Items must be completed for initial notification

Figure G-3. Emergency Notification & Release Form

SUBMISSION DATE: November 26, 2003.

A-3138 (3/21/03)

EMERGENCY NOTIFICATION FORM

Page 2 of 2

Agency	Telephone	Contacted by FAX	Person Contacted	Date/Time
Pike County Sheriff's Office	(740) 947-2111, Press "1" Fax (740) 947-1049	Yes: _____ No: _____		
Ohio Emergency Management Agency	(614) 889-7150 Fax (614) 889-7183	Yes: _____ No: _____		
DOE Oak Ridge Operations Center, after calls to state and locals	(865) 576-1005 Fax (865) 576-9772	Yes: _____ No: _____		
NRC Operations Center, after calls to state and locals and within 1 hour of classification	(301) 816-5100 (301) 951-0550 (301) 415-0550 Fax (301) 816-5151	Yes: _____ No: _____		

USEC Headquarters notification: Begin with first listed name on USEC Notification List. Continue down listing until notification is made.

Person Contacted: _____ Date/Time: _____

Name	Office Phone	Home Phone	Cellular Phone
Morris Brown	(301) 564-3493	Non-responsive	Non-responsive
Dennis Spurgeon	(301) 564-3311	*	*
Nick Timbers	(301) 564-3300	*	*

*Crisis Manager/Plant Shift Superintendent to provide these phone numbers.

NOTIFY THE FOLLOWING AGENCIES AS REQUIRED				
Agency	Telephone	Contacted by FAX	Person Contacted	Date/Time
If a hazardous or toxic release at PORTS has, or may affect Scioto County, notify:				
Scioto County LEPC and Scioto County EMA	(740) 354-7566 Fax (740) 355-8237	Yes: _____ No: _____		
If a release is in progress and has a direct impact on the environment outside the reservation boundary, notify:				
Ohio EPA	(800) 282-9378 Fax (614) 644-3250	Yes: _____ No: _____		
If a release of a chemical or toxic substance in excess of the reportable quantities established under CERCLA section 102.				
National Response Center	(800) 424-8802	Not Applicable		
If the event results in a fatality or hospitalization to three (3) or more individuals onsite, notify:				
OSHA	(800) 321-6742 Fax (513) 841-4114	Yes: _____ No: _____		

NOTE: ALWAYS VERIFY AGENCY FAX NUMBER WITH CONTACT BEFORE TRANSMITTING INFORMATION.

Figure G-3 (cont.)

Attachment 1

Emergency Agreements/Arrangements

SUBMISSION DATE: November 26, 2003

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COPY

MEMO OF UNDERSTANDING BETWEEN
UNITED STATES ENRICHMENT CORPORATION (USEC)
AND THE PIKE COUNTY SHERIFF'S DEPARTMENT

The United States Enrichment Corporation (USEC) and/or any successor or contracting organization and the Pike County Sheriff's Department each recognize the benefit of providing mutual assistance and cooperation.


USEC is committed to loan special equipment, such as riot control gear, metal detectors, night vision devices, and similar items requested by the Sheriff. Additionally, USEC makes available a variety of training aids (films, slides, audio/visual equipment, and miscellaneous equipment) and the use of the outdoor firing range for the Sheriff's training needs. USEC is committed to provide available resources, information, and any assistance to the Pike County Sheriff on an as-needed basis.

Similarly, the Sheriff recognizes that periodically the USEC Security Group and the facilities/property under their protection may require official law enforcement assistance from the Pike County Sheriff's Department. This is provided by means of manpower deployment during demonstrations or other crisis situations occurring at or near facilities operated and protected by USEC Security. Presently, during "O" shift hours Monday through Friday, the Sheriff can commit three officers initially with an additional ten deputies summoned and dispatched within fifteen minutes. On non Office shift hours, weekends, and holidays, two officers can be dispatched immediately with ten additional personnel contacted within fifteen minutes. These officers will arrive with the necessary equipment (weapons, radios, etc.) and will be in uniform. It is recognized that personnel from the Sheriff's Department would serve as arresting officers when needed.

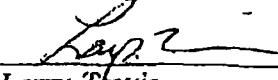
If a security situation were determined to be critical at the PORTS Plant, the Sheriff would arrange for additional assistance (manpower and/or equipment) through the Buckeye State Sheriff's Association (BSSA). This organization could dispatch officers from surrounding counties to a central assembly point near plantsite. Exact numbers and response times will vary.

Should a situation at the PORTS plant require helicopter or other aircraft support, the Sheriff would make arrangements in one of three ways: (1) The Ross County Sheriff would be contacted to arrange for deployment of a Department of National Resources helicopter based in Ross County. It is felt the earliest response time would be 45 minutes from time of notification. (2) The BSSA would be requested to dispatch a helicopter from the nearest available agency. Response times would vary. (3) The Sheriff would request assistance through the Ohio State Highway Patrol General Headquarters. A two-hour minimum response time should be expected.

This memo outlines the cooperative relationship between the Pike County Sheriff's Department and the USEC Security Group and is recognized as an asset to each organization in the performance of its duties.


Pat Musser
General Manager

2/7/01
Date


Larry Travis
Sheriff, Pike County

2-9-01
Date

United States Enrichment Corporation
Portsmouth Gaseous Diffusion Plant
P.O. Box 628, Piketon, OH 45661

PIKE COUNTY
EMERGENCY MEDICAL SERVICE
116 South Market St.
Waverly, Oh. 45690
P: 947-2995 F: 941-1389

COPY

To: Marty Redden
United States Enrichment Corporation

From: Micheal Beekman, Interim Director
Pike County Emergency Medical Service

Date: October 16, 2003

Re: Continued EMS Mutual Aid

Pike County EMS will continue to provide mutual aid coverage to USEC, DOE and their contractors and tenants.

It is our goal to be available and provide these services to the best of our abilities.

Micheal D. Beekman 10/16/03
Micheal Beekman, Interim Director
Pike County EMS

COPY

LETTER OF UNDERSTANDING

Pike Community Hospital is willing to accept employees from the United States Enrichment Corporation, the Department of Energy, and their contractors and tenants for evaluation and treatment of injuries, radiation exposure, and effects of toxic agents.



Richard E. Sobota
President and Chief Executive Officer

10.22.03

Date

COPY

LETTER OF UNDERSTANDING

Southern Ohio Medical Center is willing to accept employees from the United States Enrichment Corporation, the Department of Energy, and their contractors and tenants for evaluation and treatment of injuries, radiation exposure, and effects of toxic agents.



Randal M. Arnett
President and Chief Executive Officer

10-20-03

Date

COPY

LETTER OF UNDERSTANDING

Adena Regional Medical Center is willing to accept employees from the United States Enrichment Corporation, the Department of Energy, and their contractors and tenants for evaluation and treatment of injuries, radiation exposure, and effects of toxic agents.

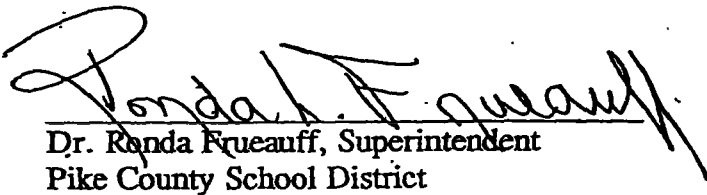
Scott R. Bryant
Scott Bryant
Director of Emergency Services

10-27-03
Date

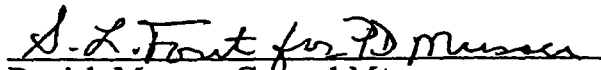
**PIKE COUNTY SCHOOLS
UNITED STATES ENRICHMENT CORPORATION
LETTER OF AGREEMENT FOR RECEPTION CENTERS**

This Letter of Agreement, by and between the Superintendent, Pike County School District, and the United States Enrichment Corporation (USEC), Portsmouth Gaseous Diffusion Plant (PORTS) General Manager, is to provide for the use of Eastern High School and Western High School as reception centers for USEC personnel.

More specifically, this Letter of Agreement authorizes occupancy of an area of each school by USEC, the Department of Energy, their contractors and tenants in the event of an evacuation of the PORTS reservation. The area of the school to be utilized by USEC will be determined by school personnel at the time of occurrence. The Crisis Manager, or designated representative, will determine the necessity for utilizing the school as a reception center and is responsible for ensuring that school personnel are notified of the impending arrival of evacuated personnel from the PORTS reservation.


Dr. Ronda Frueauff, Superintendent
Pike County School District

10/21/03
Date


Patrick Musser, General Manager
USEC-PORTS

10-31-03
Date

VALLEY LOCAL SCHOOL DISTRICT
UNITED STATES ENRICHMENT CORPORATION
LETTER OF AGREEMENT FOR RECEPTION CENTERS

This Letter of Agreement, by and between the Superintendent, Valley Local School District, and the United States Enrichment Corporation (USEC), Portsmouth Gaseous Diffusion Plant (PORTS) General Manager, is to provide for the use of Valley High School as a reception center for USEC personnel.

More specifically, this Letter of Agreement authorizes occupancy of an area of the school by USEC, the Department of Energy, their contractors and tenants in the event of an evacuation of the PORTS reservation. The area of the school to be utilized by USEC will be determined by school personnel at the time of occurrence. The Crisis Manager, or designated representative, will determine the necessity for utilizing the school as a reception center and is responsible for ensuring that school personnel are notified of the impending arrival of evacuated personnel from the PORTS reservation.


Doug Booth, Superintendent
Valley Local School District

10/21/02
Date


Patrick Musser, General Manager
USEC-PORTS

10-31-03
Date

**WAVERY CITY SCHOOL DISTRICT
UNITED STATES ENRICHMENT CORPORATION
LETTER OF AGREEMENT FOR RECEPTION CENTERS**

This Letter of Agreement, by and between the Superintendent, Waverly City School District, and the United States Enrichment Corporation (USEC), Portsmouth Gaseous Diffusion Plant (PORTS) General Manager, is to provide for the use of Waverly High School as a reception center for USEC personnel.

More specifically, this Letter of Agreement authorizes occupancy of an area of the school by USEC, the Department of Energy, their contractors and tenants in the event of an evacuation of the PORTS reservation. The area of the school to be utilized by USEC will be determined by school personnel at the time of occurrence. The Crisis Manager, or designated representative, will determine the necessity for utilizing the school as a reception center and is responsible for ensuring that school personnel are notified of the impending arrival of evacuated personnel from the PORTS reservation.

Cheryl Francis
Cheryl Francis, Superintendent
Waverly City School District

10-22-03
Date

S-L. Fort for PD Musser
Patrick Musser, General Manager
USEC-PORTS

10-31-03
Date

Date: March 26, 2002

COPY


To Whom It May Concern:

Pike County Firefighters Association has voted and given the United States Enrichment Facility permission to use the County repeater to communicate with the fire departments of the County.

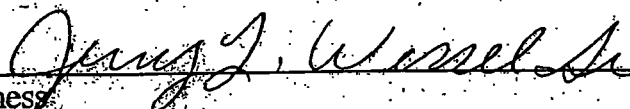
154.010 Transmitter

154.430 Receiver

131.8 Channel Guard



President



Witness

AGREEMENT FOR MUTUAL AID FOR ADDITIONAL FIRE PROTECTION

Pursuant to the provisions of paragraphs 1, 4 and 5 of Section 505.44 and 717.02 of the Revised Code of Ohio, this agreement is entered into this 27 day of JUNE, 2000 by and between the:

Waverly Fire Department
Beaver Volunteer Fire Department
Piketon- Seal Township Volunteer Fire Department
Elm Grove Volunteer Fire Department
Camp Creek Township Volunteer Fire Department
Pebble Township Volunteer Fire Department
Benton Township Volunteer Fire Department
Jackson Township Volunteer Fire Department
Scioto Township Volunteer Fire Department
Stockdale Volunteer Fire Department
United States Enrichment Corporation Fire Department
Ohio Division of Forestry- Pike State Forest
Franklin Township Fire Department
Peebles Fire Department
Brush Creek Township Fire Department
AND
Pike County Sheriff's Office

All political subdivisions under the laws of Ohio, Witnesseth:

THAT WHEREAS, the respective political subdivisions hereinabove named have certain fire fighting equipment and fire fighters to operate same, but which, in emergencies, may be inadequate to afford full and complete protection to said respective properties, and,

WHEREAS, it is desirable that in case of such emergency said respective parties hereto may have additional fire protection which may be afforded by the fire fighting equipment and personnel of others of the respective parties hereto as may then, in the opinion of the Chief or Officer in charge, of such other party or parties hereto as are called upon, IT IS MUTUALLY AGREED BY AND BETWEEN SAID PARTIES AS FOLLOWS, to wit:

1. That for purpose of affording additional protection to themselves, their contractual obligees, and their inhabitants, the parties hereto do hereby mutually agree to interchange the service of fire departments, and the use of fire apparatus and other emergency equipment, and to that end, it is hereby agreed that they, or any one or more of them shall assist the party hereto primarily responsible and responding to any fire alarm or fire call or other emergency from any Chief or Officer in charge, or other duly constituted public official which is a party of this agreement, with its or their fire fighting equipment, or other emergency vehicles and fire fighters, and shall render like services in combating fires or other emergencies as it renders to itself and its own inhabitants, provided, however, that at no time shall the party or parties upon which the request is made, be required to respond with more than one piece of fire apparatus upon the first alarm, and provided further, that in no case shall the party hereto called upon or rendering such services be liable in damage to any other party hereto or any of its inhabitants, or contractual obligees, for failure to answer any fire call or other emergency, or for lack of speed in answering any such call, or for any

COPY

inadequacy of equipment, negligent operation of equipment, failure to extinguish any fire, or for any cause whatsoever growing out of such use of said fire or other equipment and fire fighters; nor shall the party hereto, which such use of said fire or other equipment and fire fighters; nor shall the party hereto, which issued such call be liable in any manner or event for damages or loss of equipment or personnel suffered by the party or parties answering such call.


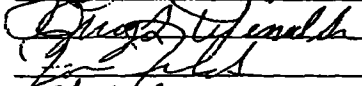
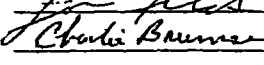
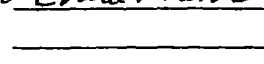
2. *It shall also be understood and agreed that all structure fires shall have, in addition to, the primary fire department, the next closest and/or available fire department alerted simultaneously and without delay, to provide tanker assistance to the primary responding fire department, and that all responding fire fighters should respond to their respective fire stations to man the fire apparatus and should not respond to the fire scene in their personal vehicles, and that the first out apparatus shall be a tanker truck capable of tending water and all other personnel and equipment should standby on their respected fire stations until requested by the responding fire departments Chief or Officer in charge as per paragraph 1. However, the mutual aid department may elect to respond with additional equipment as per local policy and procedures. The mutual aid fire department shall not be required to wait until a dispatch is received and may upon hearing their neighboring departments dispatch, elect to respond automatically to their station and/or respond automatically with a fire apparatus. Further, all fire fighters responding should have all personal protective clothing with them as per state, federal, OSHA or NFPA guidelines and/or local standard operating procedures.*
3. *Additionally, all daytime brush fires shall have, in addition to, the primary fire department, the next closest and/or available fire department alerted simultaneously and without delay, to provide additional fire fighters, vehicles and equipment capable of combating fires of this type. All responding firefighters should respond in accordance to paragraph 2.*
4. *It shall also be understood that a certified fire fighter, Chief or Officer in charge shall acknowledge all fire or emergencies dispatched, within five minutes of the alert via radio or telephone. If the fire department does not respond with a fire apparatus within ten minutes of the alert, then the mutual aid department shall become the primary responding fire department and the next closest and/or available fire department shall then be alerted as the mutual aid department. This shall also apply to the mutual aid fire department and in the event the mutual aid department is not manned then another department shall be alerted using the same procedures as above. Further, you should not answer or acknowledge a fire or emergency call if you are out of your fire district and not within a reasonable response time. The primary responding fire departments Chief or Officer in charge shall immediately assess the fire or emergency scene and cancel the mutual aid department or request additional response without delay. The Chief or Officer in charge should advise the dispatch center of any errors in dispatch immediately upon hearing or learning of any such error and should offer the correct information without delay.*
5. *It is also to be understood that the primary dispatch center for Pike County is located in the Pike County Sheriff's Office and that the on duty dispatcher will be*

responsible for the alerting of the correct primary and mutual aid fire department in accordance with the E911 system and available maps. This dispatcher will also be responsible for any necessary radio or phone calls as needed or requested by the Chief or Officer in charge. All requests should be kept to a minimum and all Chiefs or Officers in charge should remember that the dispatcher might be delayed in times of great demand.

6. That for the purpose of this agreement, mutual aid is hereby defined as "The aid rendered by or between subdivisions of government owned and operated fire fighting or other emergency equipment and shall not include primary response to any alarm of fire or other emergency made by a subdivision legally responsible for such primary response."
7. This contract shall be made and remain in full force and effect for perpetuity, provided, however, that any party may terminate this contract upon thirty days notice, in writing, to all other parties.

IN WITNESS WHEREOF, said respective political subdivisions parties hereto, have hereunto caused this agreement to be executed as provided by ordinance or resolution duly adopted for that purpose, a copy of which is hereto appended, this 27 day of JUNE, 2000.

The following Committee Members prepared this document for the Pike County Firefighters Association:

Jerry Wessel Jr.		Date <u>5-30-00</u>
Jerry Wessel Sr.		Date <u>5-30-00</u>
Jason Fields		Date <u>5-30-00</u>
Charlie Brunner		Date <u>6-27-00</u>
Dave Henson	_____	Date _____

And approved by:

Pike County Prosecuting Attorney

C. Robert Junk		Date <u>08/30/00</u>
----------------	---	----------------------

City of Waverly Fire Department, Waverly, Ohio 45690

Mayor Wesley K. Bell

Chief John H. Bell

Village of Beaver Volunteer Fire Department, Beaver, Ohio 45613

Mayor Ray B. Brown

Chief Stephen Phippi

Township of Seal Township Volunteer Fire Department, Piketon, Ohio 45661

Trustee Larry E. Scarff

Chief Charles O. Seeth

Elm Grove Volunteer Fire Department, Elm Grove, Ohio 45626

457. Chief Raymond Carraway

Chief Robert D. Clark

Township of Camp Creek Township Volunteer Fire Department, Ohio

Treasurer Rebecca Reeder

Chief Robt. A. Cole

Township of Pebble Township Volunteer Fire Department, Ohio

Trustee Ed Lawrence Lawton

Chief Donald E. Cooper

Township of Benton Township Volunteer Fire Department, Ohio

Trustee Douglas J. Dewey

Chief Chiff. Ray Hallam

Township of Jackson Township Volunteer Fire Department, Ohio

Trustee Shirley H. Whit

Chief Walter E. Hanks Jr

Township of Scioto Township Volunteer Fire Department, Wakefield, Ohio 45687

Trustee Lydia L. Zidest

Chief Carl E. Hanks

Stockdale Volunteer Fire Department, Stockdale, Ohio 45683

Trustee Steve M. Hays

Chief Charles H. Brunner

United States Enrichment Corporation Inc. Fire Department, Piketon, Ohio 45661

Manager

Legal

Legal

Ohio Division of Forestry, Pike State Forest, Latham, Ohio 45646

Manager

Manager

Township of Franklin Township Volunteer Fire Department

Trustee

Chief

Peebles Fire Department, Peebles, Ohio

Trustee

Chief

Township of Brush Creek Volunteer Fire Department, Sinking Springs, Ohio 45172

Trustee

Chief

Office of Pike County Sheriff, Waverly, Ohio 45690

Sheriff

Commissioner

Commissioner

Commissioner

PURCHASE ORDER



SHIP TO: Not Applicable

VENDOR:

WORD ALIVE FELLOWSHIP
204 COMMERCIAL BLVD
PIKETON, OH 45661

BILL TO: United States Enrichment Corporation
Attn: Accounts Payable Dept.
P.O. Box 628, MS-6006
Piketon, OH 45661
United States

FAX: 740-289-2654

PH: (740) 289-4030

Purchase Order 578856	Revision 6	Page 1 of 12
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The Purchase order number must appear on all invoices, packing slips, cartons and correspondence related to this order

Date of Order: 16-MAY-00	Buyer: J Lacefield
Revised Date: 04-FEB-03 10:37	Buyer: L Buckle

Vendor No: 11147	Customer Number:	Payment Terms: NET 10	F.O.B. N/A	Ship Via: N/A
Freight Terms: N/A	Seller Contact: RICK STRUCKEL	(740) 289-4030	Authorized Signature:	

Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>REVISION NUMBER 6:</p> <p>Revision number 6 adds Item #4 to add funding to extend the Period of Performance to December 31, 2003. This changes the overall budget from \$7,500.00 to \$10,000.00. This revision also changes the buyer to Lisa Buckle (740) 897-2284. All other conditions shall remain the same.</p> <p>*****</p> <p>ACCEPTANCE OF CONTRACT REVISION 6:</p> <p>The Seller hereby accepts this Contract revision as set forth herein. Acceptance is expressly limited to the Terms & Conditions specified herein.</p> <p>By: _____ (Signature)</p> <p>Name and Title: _____</p> <p>Date: _____</p>					

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PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 2 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>*****</p> <p>REVISION NUMBER 5:</p> <p>Revision number 5 adds item #3 to extend the Period of Performance to December 31, 2002. This increases the budget by \$2,500.00 and changes the overall budget from \$5,000.00 to \$7,500.00. All other conditions remain the same. Per telecon with Rick Struckel.</p> <p>*****</p> <p>Revision 4:</p> <p>Revision 4 changes the Buyer to Steven Akers (740-897-3581). All other conditions remain the same.</p> <p>Revision No. 3: Revised in accordance with verbal agreements between WAF and JPIC personnel, as a result of the initial drill operations, as follows: (1) Premises/Facility, #6: added USEC furnished copier; (2) JPIC Operations: increased sets of keys to seven; and, (3) Participatory Responsibilities USEC; 3.), #3: added cable to front classroom. There are no other changes.</p> <p>*****</p> <p>Revision No. 2: Revisions made based on agreements at 02/16/01 meeting on the Word Alive Fellowship premises [Attendees: R. Struckel, D. Shilling (WAF); M. Redden, C. Bauer, and J. Lacefield (USEC)].</p> <p>*****</p> <p>Revision No. 1: Revisions made based on the on-going discussions, additions and deletions since lease was issued for Acceptance of Contract (05/16/00).</p> <p>*****</p> <p>Please refer all questions to the Buyer, Jesse Lacefield, phone number 740-897-3758, fax 740-897-3771, or e-mail at lacefieldjm@ports.usec.com.</p> <p>The Purchase Order is for the lease of premises of real property, located at 204 Commercial Blvd, Piketon, Ohio 45661, as set forth below.</p> <p>The leased premises of the real property are and shall at all times remain the sole property of the Vendor [Word Alive Fellowship (WAF)], and the Corporation (USEC) shall have no right, title, or interest therein except as expressly set forth in any resultant lease.</p>					

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Continued

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 3 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>The terms of the lease and consideration thereof, including reimbursement of required improvements, additions, and/or modifications to the premises and/or real property, are expressly set forth below.</p> <p>Any sales or use taxes applicable to this PO will be paid by the Corporation to the state or commonwealth on a direct payment permit (Ohio Direct Payment #98-002678 or Kentucky #030811).</p> <p>Note: The Purchase Order number must appear on all invoices, bills of lading, packages, and documentation regarding this contract.</p> <p>INDEMNIFICATION, WORKERS' COMPENSATION</p> <p>Indemnification:</p> <p>The Corporation agrees to hold the Vendor harmless for injuries to Corporation personnel while occupying the Vendor's premises during the performance of the JPIC operations.</p> <p>Workers' Compensation:</p> <p>The Corporation has been authorized to continue operations under Sections of the Ohio Law covering self-insured risks. The following documentation is attached for reference:</p> <ol style="list-style-type: none"> 1. The Ohio Bureau of Workers' Compensation, dated March 19, 2000 2. Finding Of Facts, Term from May 1, 2000 to May 1, 2001 3. Certificate Of Employer's Right To Pay Compensation Directly <p>This Purchase Order constitutes the Contract between the Vendor and the Corporation, subject to and including the terms set forth herein.</p>					
1	<p>Cost of one (1) year's lease, beginning February 1, 2001 of the Word Alive Fellowship premises, located at 204 Commercial Blvd, Piketon, Ohio.</p> <p>STATEMENT OF WORK</p> <p>GENERAL PURPOSE OF JPIC</p> <p>The Joint Public Information Center (JPIC) is established as part of the</p>	31-JAN-02	2,500.00	EACH	1.00	2,500.00

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PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 4 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>Portsmouth Gaseous Diffusion Plant's Emergency Plan as outlined in the NRC application of Vol. 3 (6.1.7). The JPIC is the designated location for the dissemination of official information about the emergency to the media and to the public.</p> <p>The JPIC operations are described in designated Emergency Plan Implementing Procedures (EPIPs). The JPIC accommodates the following:</p> <ol style="list-style-type: none"> 1. Coordination of information with interfacing Federal, State, and Local organizations and spokespersons, 2. Press releases and media briefings, and 3. Work space for the site personnel, interfacing organization personnel, and representatives of the news media. <p>PREMISES/FACILITY REQUIREMENTS/FURNISHINGS/EQUIPMENT PROVIDED BY VENDOR</p> <p>The Vendor shall provide the following premises, facility requirements, and furnishings (i.e., tables, chairs) and equipment (i.e., computer with internet access, and photo copiers, including set-up, for the JPIC operations. These furnishings and equipment shall be reviewed quarterly to determine the minimum requirements. (Note: The Corporation shall furnish all copy paper, office and miscellaneous supplies as required)</p> <p>The following documents (attachments), for reference and clarity, indicate the specific floor plan locations of the premises which are required for the JPIC operation:</p> <ol style="list-style-type: none"> 1. Upper Level, Outside Stairwell Entry Area (App. C, Pg. 1 of 3) 2. Ground Level, Sanctuary Area (App. C, Pg. 2 of 3) [For facility reference] 3. Ground Level, Gym Area (App. C, Pg. 3 of 3) <p>Specific Descriptive Locations</p> <ol style="list-style-type: none"> (1) Media Briefing Room [Pg. 3 of 3] <ul style="list-style-type: none"> Sound system (e.g., public address) (If required, shall be provided by the Corporation) Electrical outlets Filming area for TV cameras Accessible for satellite truck connections Space available for up to three (3) telephone lines 					

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Continued

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 5 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
(2)	Registration Area [Pg. 3 of 3] Table and chairs for three (3) JPIC staff for use in registering news media in close proximity to the Media Briefing Room.					
(3)	Public Information Officer (PIO) Work Room [Pg. 1 of 3] Table and chairs for up to ten (10) people Floor space for visual aids Space available for up to ten (10) telephone lines					
(4)	Media Monitoring [Pg. 1 of 3] Two (2) TV antennas with rotors (one pointed toward Columbus, OH and one pointed toward Huntington, WV) Two (2) TVs with VCRs [To be provided by the Corporation] Computer with internet capability Chairs for up to two (2) people					
(5)	Telephone Banks [Pg. 1 of 3] Space available for up to (10) telephone lines Table and chairs for up to eight (8) people Space for visual aids					
(6)	Administrative Support Area [Pg. 1 of 3] Work tables and chairs for up to seven (7) people Two (2) facsimile machines [To be provided by the Corporation] Two (2) computers with word processing [To be provided by the Corporation] Two (2) photo copiers Tables for equipment noted above. [Rev. 3] The Corporation shall furnish one (1) copier (leased), to remain on the premise, for use during operations; copier shall be locked while not in use; WAF shall not be held responsible for protection of the copier.					
(7)	Storage Areas [Pg. 1 of 3] Dedicated storage area, or areas, to store a number of plant visuals which are encased in glass; and, two (2) TVs with VCRs.					

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PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 6 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>Electrical outlet(s) Lighting</p> <p>SERVICES PROVIDED BY VENDOR The Vendor shall provide the following services for the JPIC operations. (1) Utilities, including heating, ventilating and air conditioning, electrical and lighting (2) Maintenance of the facilities (3) Maintenance of the premises, including mowing and snow removal (4) Janitorial, including premises and facilities</p> <p>INSPECTION OF LEASED PREMISES AND FACILITIES The following inspections shall be made to assure that the premises and facilities are maintained in a pre-lease (i.e., Contract) condition per the responsible party(ies) per resolution(s) of the party(ies):</p> <p>(1) On or before the effective date of the lease (i.e., Contract): A detailed inspection of the premises and facilities shall be conducted by the Vendor and the Corporation. A written inspection report (i.e., "initial report"), outlining the results (i.e., "initial condition(s)") of the inspection, shall be drafted by the Corporation, reviewed, amended (if required), and shall be signed by both parties as accepted.</p> <p>(2) At the conclusion of the lease: A similar inspection shall be conducted as in Item (1). The findings shall be compared with the initial report. A determination shall be made, to the satisfaction of both parties, as to whether the Corporation has an obligation to restore either the premises and/or the facilities to the same initial condition(s).</p> <p>JPIC OPERATIONS: AVAILABILITY OF LEASED PREMISES/FACILITIES, AND ACCESS The JPIC must be a facility where activation can occur within one (1) hour or less of an event (whether declared in a real, drill, or exercise situation) twenty-four hours a day, on every calendar day of the year.</p> <p>The Corporation shall conduct quarterly JPIC drills. Drills are not expected to be conducted on a Sunday.</p>					

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Continued ...

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 7 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>Quarterly surveillances (i.e., March, June, September, and December) of the leased premises and facilities shall be made for the purpose of conducting physical inventories of all JPIC items stored.</p> <p>If deemed more beneficial, USEC may conduct the media briefing(s) outside.</p> <p>The Vendor shall provide the following sets of keys, including applicable security code(s), for the use of the Corporation, whether the activation is declared real, drill, exercise or surveillance, for the noted respective access points. The sets of keys shall be securely retained by the Corporation for the duration of the lease (i.e., Contract), and shall be returned upon the completion of the lease.</p> <p>(1) Main Building: Four (4) keys (retained by selected JPIC personnel, and Plant Shift Superintendent)</p> <p>(2) Storage Areas (i.e., Closet (Upper Level)): Four (4) keys</p> <p>[Rev. 3]</p> <p>The Vendor shall provide an additional three (3) sets of keys for items (1) and (2) above due to the change in the manner that the JPIC cadre functions.</p> <p>EFFECTIVE DATE OF LEASE, LEASE PERIOD, AND CONSIDERATION</p> <p>The lease shall be in effect upon signature of acceptance by the Vendor. The lease period shall be for one (1) year for a total of \$2,500.00, The lease payment shall be in accordance with the terms set forth in the Purchase Order upon receipt of the invoice.</p> <p>OPTION TO EXTEND LEASE</p> <p>The Corporation may unilaterally extend the term of this lease (i.e., Contract), with the approval of the Vendor, and such approval shall not be unreasonably withheld (e.g., health, safety and welfare of the Vendor personnel, congregation and students) by written notice to the Vendor, delivered on or before the completion of the date set forth herein, for a period of one (1) year after the completion date set forth herein ("Option Period"). If the Corporation exercises this option, the completion date shall be deemed to be the very last day of the Option Period, and all terms of this Contract, including this option, shall apply during the Option Period, but in no event shall the Contract be extended beyond January 31, 2004.</p>					

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 8 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>PRIMARY CORPORATION/VENDOR CONTACTS</p> <p>The following personnel, or their respective designated alternates, shall be the primary contacts relevant to the execution of the Contract.</p> <p>Corporation:</p> <p>Contract Coordination: Marty Redden Tel. 740-897-6122</p> <p>Procurement/Financial: Jesse Lacafeld Tel. 740-897-3758</p> <p>Installations/Modifications: Cheryl Bauer Tel. 740-897-2193</p> <p>Vendor: [Tel. 740-289-4030]</p> <p>Contract Coordination: Reverend Rick Struckel</p> <p>Financial/Invoicing: Tommie Schrader</p> <p>Installations/Modifications: Dan Schilling</p> <p>On Call Representative: Jeff Forbes (Cell #740-708-0525)</p> <p>On Call Alternate: Joe Assisi (Cell #740-350-4227)</p>					

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Continued

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 9 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
2	<p>Costs associated with improvements, additions, and modifications relevant to premises or real property; and, reimbursable services for on site assistance.</p> <p>VENDOR FURNISHED REIMBURSABLE ITEMS</p> <p>The Corporation shall reimburse the Vendor for the following improvements, additions, or modifications which shall become the property of the Vendor upon termination of the Contract; and, personnel or services assistance during JPIC operations:</p> <p>Improvements, Additions, Modifications:</p> <ol style="list-style-type: none">1. Installation (labor, material) of two (2) television antennas, with rotors; and roof, siding or tower bracing as determined by Vendor; and, cable run to Media Monitoring area2. Installation (labor, material) of radio antennas <p>Personnel, Services Assistance:</p> <ol style="list-style-type: none">3. In the event of a JPIC operation, whether declared real, drill, exercise or surveillance, a Vendor's on call representative shall be available for assistance to the JPIC staff. The Corporation shall pay the Vendor a rate in the amount of \$100.00/day for these services.4. In the event of an actual emergency, or an event other than a scheduled drill, the Corporation shall pay the Vendor a rate in the amount of of \$300.00/day, for the duration of the JPIC operation, to cover miscellaneous costs and utilities use.5. If required, the Vendor shall be capable of providing meals to the JPIC staff for a cost in addition to the terms of the Contract. <p>PARTICIPATORY RESPONSIBILITIES, COORDINATION OF RELOCATION EFFORT</p> <p>The following are the agreed upon participatory responsibilities for the JPIC relocation effort:</p> <p>USEC Responsibilities:</p> <ol style="list-style-type: none">1. Since the Word Alive Fellowship/Miracle City Academy (WAF/MCA) will not be using the JPIC telephone lines, SCOCA and USEC agree that it would be best not to use the SCOCA telephone switch.	13-MAR-01	2,500.00	EACH	1.00	2,500.00

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PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 10 of 12
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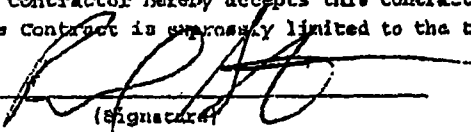
Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension						
	<p>USEC shall arrange, and pay, for the transfer of the JPIC telephone lines from the Vern Riffe Vocational School (VRVS) to the WAF/MCA facility.</p> <p>USEC will continue to buy the service for the needed twenty-six (26) telephone lines from Verizon, the local common carrier. The telephone devices used today will work with the new equipment.</p> <p>2. USEC shall provide the telephones, wall jacks, wire punchdown blocks, fiber terminations cabinet (to be located at WAF/MCA), etc. needed for the JPIC telephone and data connections.</p> <p>USEC and their subcontractor staff shall supply all material, equipment and installation effort that is not provided by Verizon for the JPIC voice and data connections.</p> <p>3. USEC shall provide the following necessary material, equipment and effort to SCOCA for use in the relocation effort:</p> <table><tr><td>Fast Ethernet Switching Hub</td><td>Fiber Optic Cable</td></tr><tr><td>Fast Ethernet Media Converters</td><td>Fiber Termination and Equipment</td></tr><tr><td>Fiber Connecting Cables</td><td>USEC/Horizon Assistance</td></tr></table> <p>[Rev. 3]</p> <p>Cable to Front Classroom to allow media monitoring to work from the area.</p> <p>NOTE: Upon transfer of the above to, and acceptance by, SCOCA, the material and equipment shall no longer be the property of USEC. Therefore, USEC shall not be responsible for the maintenance, repair, or any operational conditions, of the material and equipment.</p> <p>SCOCA Responsibilities:</p> <p>1. SCOCA shall provide Internet access for the JPIC workstations, firewall protection and Internet addresses. The level of service will be the same as that offered to other SCOCA clients.</p> <p>The staff and students of the Cisco Academy, which is a part of the VRVS, shall install wiring inside the WAF/MCA facility, that provide Internet data access, under the direction of SCOCA.</p>	Fast Ethernet Switching Hub	Fiber Optic Cable	Fast Ethernet Media Converters	Fiber Termination and Equipment	Fiber Connecting Cables	USEC/Horizon Assistance					
Fast Ethernet Switching Hub	Fiber Optic Cable											
Fast Ethernet Media Converters	Fiber Termination and Equipment											
Fiber Connecting Cables	USEC/Horizon Assistance											

G-64

Continued

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 11 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
	<p>2. Reference: USEC, Item 3 (i.e., acceptance of material, equipment)</p> <p>NOTE: SCCA shall be acting on behalf of WAF/MCA in all relocation efforts; no contractual agreement shall, nor be presumed, to exist between USEC and SCCA in performance of the relocation efforts by all participants.</p> <p>WAF/MCA Responsibilities:</p> <p>1. WAF/MCA shall arrange for the burial of both the fiber optic cable and the telephone cable to be installed for the JPIC operations.</p> <p>2. Reference: USMC Items 2 (i.e., location), 3 (i.e., NOTE)</p> <p>NOTE: It is agreed that neither material, nor equipment, is being installed for which USEC would be responsible for a reimbursement of shared cost relevant to the telephone and internet systems.</p> <p>COORDINATION OF RELOCATION EFFORT</p> <p>The following documents (attachments) are provided for the graphic clarity of the scope of work responsibilities, and for scheduling and coordination of the relocation effort by all participants.</p> <p>1. Graphic Schematic</p> <p>2. JPIC Relocation Schedule (dated February 16, 2001)</p> <p>ACCEPTANCE OF CONTRACT</p> <p>The Contractor hereby accepts this contract as set forth herein. Acceptance of this contract is expressly limited to the terms and conditions of the contract.</p> <p>By:  (Signature)</p> <p>Name and Title: <u>Richard Struckel Pres.</u></p> <p>Date: <u>2-04-03</u></p>					

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Continued...

PURCHASE ORDER

Purchase Order 578856	Revision 6	Page 12 of 12
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Item	Part Number/Description	Delivery Date	Quantity	UOM	Unit Price	Extension
3	Cost of rental of the Word Alive Fellowship/Miracle City Academy to serve as the JPIC facility for calendar year 2002.	31-DEC-02	2,500.00	EACH	1.00	2,500.00
4	Cost of rental of the Word Alive Fellowship/Miracle City Academy to serve as the JPIC facility for the calendar year 2003.	31-DEC-03	2,500.00	JOB	1.00	2,500.00

G-66

Memo

Date: 11/12/02

From: Donnie Locke

RE: Class 1 RCRA Part B Permit Modification

Due to recent organization changes, it is necessary to issue a Class 1 modification to the RCRA Part B Hazardous Waste Contingency Plan for the Portsmouth Gaseous Diffusion Plant (BJC/PORTS-35/R2, Section G). This is a controlled document issued through the Bechtel Jacobs Company Document Management Center. You or your organization was provided a copy or copies of this document in September 2001.

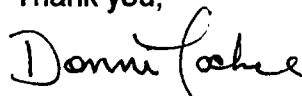
Please find the following enclosed documents:

1. DOE memo EM-97-0539, dated October 23, 2002, which includes the signed certification statement
2. Updated Distribution List
3. Strike-through pages identifying changes.
4. Clean-copy replacement pages.
5. New document cover

In your copy of the document please replace the existing letter and certification statement with #1. Replace with existing distribution list with #2. Replace the existing pages with the appropriate pages in #4. And replace the existing document cover with #5.

Item #3 is included only for your review and should not be inserted into you document. Also please note that the document ID has change to BJC/PORTS-35/R4.

Thank you,



Donnie Locke, C.J. Enterprises

November 7, 2002

Notification of Class 1 Modification to the Resource Conservation and Recovery Act (RCRA) Part B
Permit (04-57-680) – Portsmouth Gaseous Diffusion Plant

Distribution List

NOTE: Asterisk (*) denotes organizations having a Mutual aid Agreement with DOE/BJC LLC. All others are interested stakeholders only.

Chief Harold Cooper Pebble Township Fire Department* 18794 State Rt. 77 Waverly, OH 45690	Chief Bryan McDowell Camp Creek Township Volunteer Fire Department* 101 Hungry Hollow Rd. Lucasville, OH 45648
Chief Greg Holdren Benton Township Fire Department* 13553 State Rt. 124 Idaho, OH 45661	Chief Chuck Valentine Waverly Squad #2 P.O. Box 364 Waverly, OH 45690
Chief Jack Harris Jackson Township Volunteer Fire Department* 16553 State Route 335 Beaver, OH 45613	Chief Jason Fields Beaver Squad #3 86 West Road Beaver, OH 45613
Chief Carl Hines Scioto Township Fire Department* 2000 Wakefield Mound Rd. Piketon, OH 45661	Chief Beth Trent Piketon Squad #4 219 Forsythe Street Piketon, OH 45661
Chief Charlie Brunner Stockdale Volunteer Fire Department* Stockdale, OH 45683	Chief Todd Brannan Elm Grove Squad #5 9220 State Rt. 772 Piketon, OH 45661
Chief Randy Armbruster Waverly Fire Department* 316 Elizabeth Lane Waverly, OH 45690	Chief Darla Cooper Pebble Township Squad #7 18794 State Rt. 772 Waverly, OH 45690
Chief Roger Overly Beaver Fire Department* 5540 State Rt. 335 Beaver, OH 45613	Chief Marion Massie Benton Township Squad #8 545 Walls Road Waverly, OH 45690
Chief Charles Leeth Piketon Fire Department* Piketon, OH 45661	Mr. Jerry Wessel, Chief Pike County Firefighter's Association* 612 Giers Rd. Waverly, OH 45690
Chief Jeff Beekman Elm Grove Volunteer Fire Department* 8349 State Rt. 772 Piketon, OH 45661	Waverly City Schools 500 2 nd Street* Waverly, OH 45690
Pike County Schools* 23365 State Rt. 124 Piketon, OH 45661	Valley Local Schools* P.O. Box 888 Lucasville, OH 45648
Vern Riffe Joint Vocational School* 23365 State Rt. 124 Piketon, OH 45661	Mr. Donald Simonton, Director Pike County Emergency Management Agency* 2577 Alma Omega Road Waverly, OH 45690 (6 copies)

Mr. Larry Travis Pike County LEPC/Sheriff* 108 East Second Street Waverly, OH 45690	Lt. Robert Woodford Ohio State Highway Patrol Post 73 Lucasville, OH 45648
Ms. Kim Carver, Director Scioto County Emergency Management Agency 2010 Charles Street Portsmouth, OH 45662	Scioto County Sheriff Scioto County Courthouse 602 Seventh Street Portsmouth, OH 45662
Ms. Tracy Casto Director of Emergency Services Pike Community Hospital* 100 Dawn Lane Waverly, OH 45690	Chief Dick Lusk Pike State Forest 334 Lapperell Latham, OH 45646
Mr. Roger McAllister Scioto County LEPC P.O. Box 45 Rarden, OH 45671	Ms. Peggy Landrum Director of Emergency Services Adena Regional Medical Center * 272 Hospital Rd Chillicothe, OH 45601
Mr. James Williams Deputy Director Ohio Emergency Management Agency 2855 West Dublin Granville Rd. Columbus, OH 43235	Dr. William Aurich Director of Emergency Services Southern Ohio Medical Center* 1805 27 th Street Portsmouth, OH 45662
<u>United States Department of Energy</u> <u>Portsmouth Facility</u> <u>Attn: Melda Rafferty</u> <u>P.O. Box 700</u> <u>Piketon, OH 45661</u>	U. S. Environmental Protection Agency-Region V Attn: Ms. Harriet Croke RCRA Permitting Branch, DRP-8J 77 West Jackson Boulevard Chicago, IL 60604
Ohio Environmental Protection Agency Southeast District Office Attn: Mr. Dave Chenault 2195 Front Street Logan, OH 43138 (3 copies)	<u>USEC Fire Department*</u> (1 copy) <u>Attn: Mr. Marty Redden</u> (3 copies) <u>P.O. Box 628</u> <u>Piketon, OH 45661</u>
<u>Bechtel Jacobs Company LLC</u> (3 copies)	<u>Waste Management (2 copies, one each for X-326</u> <u>L-Cage and X-7725 waste storage facilities)</u>
Ohio Environmental Protection Agency Division of Drinking and Groundwater Lazarus Government Center 122 South Front Street Columbus, OH 43216-1049	Ohio Environmental Protection Agency Division of Surface Water Lazarus Government Center 122 South Front Street Columbus, OH 43216-1049
U. S. Army Corps of Engineers Attn: Mr. Doug Shelton CERL-OP-FN, P.O. Box 59 Louisville, KY 40201-0059	Ohio Environmental Protection Agency Division of Air Pollution Control Lazarus Government Center 122 South Front Street Columbus, OH 4316-1049
Seal Township Trustees P.O. Box 262 Piketon, OH 45661	The Honorable Carl D. Irvine Mayor, City of Piketon P.O. Box 457 Piketon, OH 45661-0562
The Honorable Dennis Stapleton Ohio House of Representatives Riffe Center – 13 th Floor Columbus, OH 43266-0603	Pike County Commissioners' Office 100 East Second Street Waverly, OH 45690

The Honorable Ted Strickland United States Representative 1236 Gallia Street Portsmouth, OH 45662	The Honorable Doug White State House Senate Office Building, 1 st Floor Columbus, OH 43215
The Honorable Mike DeWine United States Senate 37 West Broad Street Columbus, OH 43215	The Honorable George V. Voinavich United States Senate 37 West Broad Street Columbus, OH 43215
Ohio Hazardous Waste Facility Board Attn: Mr. Raymond Roe Lazarus Government Center 122 South Front Street Columbus, OH 43215	Ohio Environmental Protection Agency Department of Emergency and Remedial Response Attn: Maria Galanti 2195 Front Street Logan, OH 43138
Ohio Environmental Protection Agency Public Interest Center Attn: Mrs. Carol Hester Lazarus Government Center 122 South Front Street Columbus, OH 43215	Ohio National Guard Attn: Master Sgt. DeLotell P.O. Box 725 Piketon, OH 45661
Chief H. Cooper Peebles Fire Department 18794 St. Rt. 772 Waverly, OH 45690	Franklin Township Volunteer Fire Department 1258 Adkins Rd. Peebles, OH 45660
USEC Police Department Attn: Jim Snodgrass P.O. Box 628 Piketon, Ohio 45661 (1 copy)	

(bolded names are new distributees)



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010
Fax: 740-897-2982

October 23, 2002
EM-97-0539

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

Dear Ms. Stewart:

RCRA PART B PERMIT NO. 04-66-0680/04-66-0000-703 CLASS 1 MODIFICATION

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modification (modification C.6.d as provided in the Appendix to Ohio Administrative Code (OAC) Rule 3745-50-51) to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The modification contains revisions to Section G, Contingency Plan, and includes updates to the distribution list for the Contingency Plan (page G-2), agency list with whom mutual aid agreements are established (pages G-19 and G-20), list of Emergency Coordinators in Table G-1 (page G-25), Figure G-3 (pages G-31 and G-32), and emergency agreements in Attachment 1 (pages G-49 through G-66).

The following items are included in this submittal:

- Certification statement as required by OAC Rule 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application
- Overstrike pages corresponding to the replacement pages that delineate the changes made to the permit renewal application

Old language that has been removed from the permit application has been overstruck and new text is capitalized. Replacement pages that have changed have the page header "SUBMISSION DATE: October 21, 2002". Please note that because the permit application is printed double-sided, pages that have not been changed still bear the original and/or previous submission date.

Both overstrike pages and replacement pages are included in this submittal, except overstrike pages are not provided for Figure G-3 (pages G-31 and G-32) and the renewed emergency agreements (pages G-49 through G-66) because these items have been updated in their entirety. The overstrike pages are provided solely to aid the Ohio Environmental Protection Agency (Ohio EPA) in identifying the changes made to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstruck language has been removed and capitalized text has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application.


Ms. Stewart

-2-

October 23, 2002

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vranicar".

Russell J. Vranicar
Acting Site Manager
Portsmouth Site Office

Enclosures

cc enclosure:

Harriet Croke, U.S. EPA/Region 5

Pam Allen, Ohio EPA

Gil Drexel, BJC/PORTS

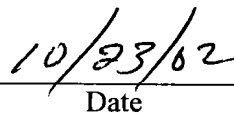
Administrative Records

Certification Statement

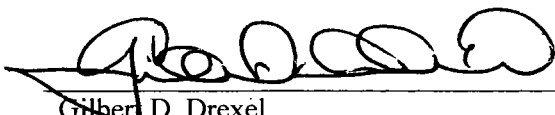
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



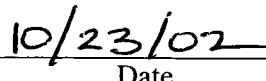
Russell D. Vranicar
Acting Site Manager
Department of Energy
Portsmouth Site Office



Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC



Date

Memo

OH 7890006983

RECEIVED

AUG 13 REC'D

Corrective Action Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5

RCRA RECORDS
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Date: 8/1/02

From: Donnie Locke

RE: Class 1 RCRA Part B Permit Modification

Due to recent organization changes, it is necessary to issue a Class 1 modification to the RCRA Part B Hazardous Waste Contingency Plan for the Portsmouth Gaseous Diffusion Plant (BJC/PORTS-35/R2, Section G). This is a controlled document issued through the Bechtel Jacobs Company Document Management Center. You or your organization was provided a copy or copies of this document in September 2001.

Please find the following enclosed documents:

1. DOE memo EM-97-0441, dated July 15, 2002, submitting the subject modification to Ohio EPA and Certification Statement
2. Section G, Contingency Plan (strike-through pages identifying changes.)
3. Section G, Contingency Plan (clean-copy replacement pages)
4. New document cover

In your copy of the document please replace the existing letter and certification statement with #1. And replace the existing pages G-25 thru G-26 with the appropriate pages in #3. Please replace the existing document cover with #4.

Item #2 is included only for your review and should not be inserted into your document. Also please note that the document ID has change to BJC/PORTS-35/R3.

Thank you,

Donnie Locke, C.J. Enterprises



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

July 15, 2002
EM-97-0441

OH 7890008983

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

Dear Ms. Stewart:

CLASS 1 RCRA PART B PERMIT MODIFICATION

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit No. 04-66-0680/OH7890008983. The modification updates the addresses and home telephone numbers of the Emergency Coordinators in Table G-1 of Section G (Contingency Plan), page G-25 (modification C.6.d as provided in the Appendix to Ohio Administrative Code (OAC) 3745-50-51).

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application
- Overstrike pages corresponding to the replacement pages that delineate the changes made to the permit renewal application

Old language that has been removed from the permit application has been overstruck and new text is capitalized. Replacement pages that have changed have the page header "SUBMISSION DATE: July 14, 2002". Please note that because the permit application is printed double-sided, pages that have not been changed still bear the original and/or previous submission date.

Both overstrike pages and replacement pages are included in this submittal. The overstrike pages are provided solely to aid the Ohio Environmental Protection Agency (EPA) in identifying the changes made to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstruck language has been removed and capitalized text has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application.

July 15, 2002

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon J. Robinson".

Sharon J. Robinson
Site Manager
Portsmouth Site Office

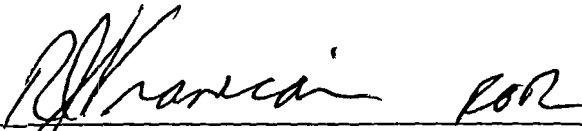
Enclosures (2)

cc enclosures:

Harriet Croke, U.S. EPA/Region 5
Pam Allen, Ohio EPA/Columbus
Gil Drexel, BJC/PORTS
Administrative Records

Certification Statement

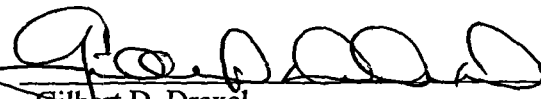
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



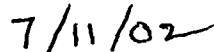
Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office



Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC



Date

Section G, Contingency Plan
(strike-through page to identify changes)

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
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Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W May			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

SUBMISSION DATE: July 13, 2001

Table G-2 Site Emergency Equipment

EQUIPMENT DESCRIPTION	AMOUNT	LOCATION	PURPOSE
SPRINKLER SYSTEMS	≈80	X-326	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈350	X-326	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
BUILDING HORNS	>10	X-326	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-326	ALLOWS TWO WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATIONS, ETC.
COMMERCIAL TELEPHONES	>6	X-326	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
TOWELS, MOPS, BUCKETS, ETC.	1	X-326	SPILL CLEAN-UP
DRUM PUMP	1	X-326	LIQUID WASTE TRANSFER
LARGE SPILL CABINET	1	X-326	FOR SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
PH METER	1	X-7725	USED TO IDENTIFY PH OF MATERIAL
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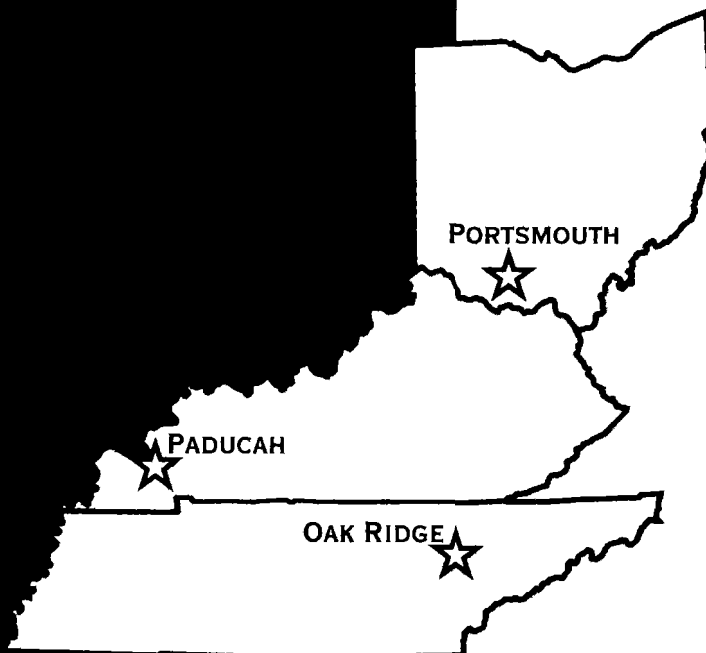
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**ENVIRONMENTAL MANAGEMENT
& ENRICHMENT FACILITIES
MANAGEMENT AND INTEGRATION CONTRACT**

**Resource Conservation
and Recovery Act (RCRA)
Hazardous Waste Contingency Plan
for the
Portsmouth Gaseous
Diffusion Plant**



**MANAGED BY
BECHTEL JACOBS COMPANY LLC
FOR THE UNITED STATES
DEPARTMENT OF ENERGY**

This document has received the appropriate reviews
for release to the public.



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

July 15, 2002
EM-97-0441

Greg

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

Dear Ms. Stewart:

CLASS 1 RCRA PART B PERMIT MODIFICATION

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit No. 04-66-0680/OH7890008983. The modification updates the addresses and home telephone numbers of the Emergency Coordinators in Table G-1 of Section G (Contingency Plan), page G-25 (modification C.6.d as provided in the Appendix to Ohio Administrative Code (OAC) 3745-50-51).

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application
- Overstrike pages corresponding to the replacement pages that delineate the changes made to the permit renewal application

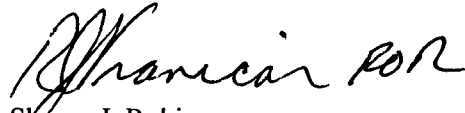
Old language that has been removed from the permit application has been overstruck and new text is capitalized. Replacement pages that have changed have the page header "SUBMISSION DATE: July 14, 2002". Please note that because the permit application is printed double-sided, pages that have not been changed still bear the original and/or previous submission date.

Both overstrike pages and replacement pages are included in this submittal. The overstrike pages are provided solely to aid the Ohio Environmental Protection Agency (EPA) in identifying the changes made to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstruck language has been removed and capitalized text has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application.

July 15, 2002

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon J. Robinson".

Sharon J. Robinson
Site Manager
Portsmouth Site Office


Enclosures (2)

cc enclosures:

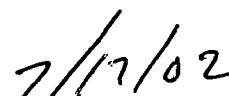
Harriet Croke, U.S. EPA/Region 5
Pam Allen, Ohio EPA/Columbus
Gil Drexel, BJC/PORTS
Administrative Records

Certification Statement


I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



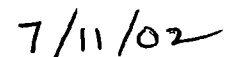
Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office



Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC



Date

Section G, Contingency Plan

(strike-through page to identify changes)

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Table G-2 Site Emergency Equipment

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SHOVELS, MOPS, BUCKETS, ETC.	1	X-7725	SPILL CLEAN-UP



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

May 3, 2002
EM-97-0354

RECEIVED

MAY 13 2002

**Technical Support and Permits Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 5**

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

Dear Ms. Stewart:

**CLASS 1 RCRA PART B PERMIT MODIFICATION DEPARTMENT OF
ENERGY/PORTSMOUTH GASEOUS DIFFUSION PLANT 04-66-0680/OH7890008983**

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modification to the DOE Portsmouth Gaseous Diffusion Plant Hazardous Waste (Part B) Permit. The modification revises the list of Emergency Coordinators in Section G (Contingency Plan), page G-6 and Table G-1 (modification C.6.d as provided in the Appendix to Ohio Administrative Code (OAC) 3745-50-51), and updates the name of the Bechtel Jacobs Company LLC Manager of Projects on page G-3 (modification B.1 as provided in the Appendix to OAC 3745-50-51).

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D)
- Replacement pages for Section G, Contingency Plan, of the permit renewal application
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Ms. Stewart

-2-

May 3, 2002

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sharon J. Robinson', followed by a long horizontal line extending to the right.

Sharon J. Robinson
Site Manager
Portsmouth Site Office

Enclosures

cc w/enclosure:

Harriet Croke, U.S. EPA/Region 5
Pam Allen, Ohio EPA
Administrative Records
Ray Miskelley, CC-10/ORO

cc w/o enclosure:

Gil Drexel, BJC/PORTS

Certification Statement

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Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office

5/2/02
Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC

4/30/02
Date

Please insert in Volume 1, Text, Section G, Contingency Plan
(clean-copy replacement pages)

The mailing address for all correspondence is:

Department of Energy
Portsmouth Site Office
Attention: Melda J. Rafferty
P.O. Box 700
Piketon, OH 45661

The primary contact for hazardous waste storage activities at PORTS is:

Bechtel Jacobs Company LLC
Attention: Gilbert D. Drexel, Manager of Projects
Environmental Management and Enrichment Facilities
P.O. Box 900
Piketon, OH 45661

The U.S. EPA Identification Number for DOE Operations at the Portsmouth Gaseous Diffusion Plant is:

OH7890008983

The Uranium Enrichment process and support facilities at PORTS are leased and operated by USEC. Emergency Response Services are available to Bechtel Jacobs Company LLC from USEC through a service agreement incorporated into the lease.

Location and Site Plan

PORTS is located near Piketon, in Pike County, Ohio, approximately 70 miles south of Columbus, on 3,714.01 federally-owned acres. The plant is two miles east of the Scioto River and one-half mile east of U.S. Route 23. The plant site consists of industrial facilities, including process buildings, several electrical switchyards, cylinder storage areas, cooling towers, a steam plant, a water treatment plant, a sewage disposal plant and pollution abatement facility, service and maintenance buildings and facilities for administrative, medical, fire and security activities. (See Figure G-1.)

PORTS is a Uranium Processing Facility with an end product being enriched uranium, used to produce fuel for the nuclear power industry. Obtaining the end product requires the use of numerous hazardous chemicals.

Employment at this facility is approximately 1750-2200.

Figure G-1 presents a layout of plantsite and shows the location of the X-326 and X-7725 Container Storage Units, the location of onsite Emergency Response Facilities, and roads and entrances inside the facility. The evacuation plans and routes are presented in Section G-7 of this Contingency Plan. USEC provides emergency response and fire protection services for the container storage units through a service agreement incorporated into the lease.

Planning Area

For the purpose of planning and response, a two-mile planning area has been established for the areas immediately surrounding the plant which could be affected by releases of hazardous substances and toxic chemicals, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

This area is the two-mile immediate notification area (INA), within a two-mile radius of the plant. This area extends out from the center of the plant. If a protective action is recommended, a public warning system alerts persons residing within the immediate notification area to seek shelter and tune to an Emergency Broadcast Station (EBS) for further information. (See Figure G-2.)

Topographical features within the planning area include the Scioto River two miles to the west and numerous wooded hills. Sensitive facilities located within the planning area include a nursing home and an electric utility.

SUBMISSION DATE: July 13, 2001

No schools are located within the immediate notification area. However, county school buses frequently travel all roads within this area.

Since PORTS is not a nuclear reactor site, emergency planning requiring an "ingestion exposure pathway" has not been considered. Such accidents would involve sequences of successive failures more severe than those postulated during the design of this plant. The Ohio Emergency Management Agency, the Pike County Emergency Management Agency, DOE, and the PORTS Emergency Management Department have determined that emergency planning is only necessary to a two-mile radius of the plant.

Land Use

A number of businesses are located west of the facility, just inside the immediate notification area. To the south and east is an area of wooded hills with scattered homes in the valleys. Land use on the western boundary of the immediate notification area is primarily agricultural, with scattered farmhouses and outbuildings amid the fields. The area north of PORTS includes residential and commercial development as well as an area of undeveloped woods and farmland.

Transportation Routes

A north-south transportation corridor containing both the Norfolk Southern Railroad and U.S. Route 23 is located approximately one-half mile west of the facility. State Route 32, an east-west highway, is located to the north of the facility outside the immediate notification area.

Hazardous Waste Storage

Buildings described in this plan are depicted on Figure G-1. DOE operates two Resource Conservation and Recovery Act (RCRA) hazardous waste storage units:

- X-326 Container Storage Unit
- X-7725 Container Storage Unit

X-326 Container Storage Unit

The X-326 Storage Unit is located in the central part of the DOE Facility. The X-326 Building has been in use since 1956. The structure is 2,230 feet long, 552 feet wide, 62 feet high and contains 58 acres of floor space. The X-326 Building is totally enclosed with a built up roof, transite walls and concrete floors. There are six areas of the building, totaling approximately 31,888 square feet, designated for the storage of hazardous waste. The storage areas are located on the first floor towards the south end of the building.

The X-326 Storage Unit is intended for the storage of high assay uranium-bearing hazardous and/or polychlorinated biphenyl wastes until further processing for uranium recovery or treatment through a permitted process is obtained. The wastes will include aqueous laboratory solutions, spent laboratory solvents and decontamination solutions from other buildings on plantsite. All containers will be constructed to Department of Transportation (DOT) specifications where available. All storage areas will have appropriate containment structures and will comply with regulatory design requirements for storing wastes.

The X-326 Storage Unit was designed and intended for the storage of high assay uranium bearing wastes until further processing for uranium recovery or treatment through a permitted process, such as a National Pollutant Discharge Elimination System-permitted discharge. The wastes that may be stored in the X-326 Storage Unit include aqueous laboratory solutions, spent laboratory solvents, and decontamination solutions from several other buildings on the plantsite.

Wastes stored in the X-326 Storage Unit may include:

D001 - Ignitables
D002 - Corrosive (acid and alkaline)
D004-D043 - TC Characteristic
F001, F002
F003, F005
Radioactive RCRA Wastes

Toxic Substance Control Act/RCRA Mixed Wastes
Radioactive/Toxic Substance Control Act/RCRA Mixed Wastes

The wastes are stored in a variety of containers, but are usually stored in DOT approved 55-gallon drums or 5-inch diameter/10-liter polyethylene bottles. Other containers as listed in Table D-2 of Section D of this application may also be used. The containers are stored on steel supports or are placed into support sleeves which are raised above the floor to prevent contact with potentially inadvertent standing liquid introduced into the area.

The X-326 Storage Unit is located in the south end on the first floor of the X-326 Process Building. Figure D-3 shows the floor plan for the X-326 Storage Unit. The X-326 Building is totally enclosed with a built-up roof, transite walls and concrete floors. Heating and cooling is provided as needed in the RCRA-permitted storage areas. The area around the building is sloped to direct run-on and run-off water to the PORTS storm sewer system.

Approximately 31,888 square feet of the X-326 is designated as storage space and will be used as required until final closure is initiated.

Five waste areas in the X-326 Building are delineated for storage: Areas 1, 2, 3, 4, 5 and the "L" Cage (the "L" Cage consists of both the east cage and the west cage). Storage area floors for 1, 2, 3, 4 and 5 were cleaned, sealed, primed and finished with a urethane-based sealant in 1992. The "L" Cage area was cleaned, any existing concrete cracks (these are "cosmetic" cracks in the surface of the concrete and not significant structural faults) sealed with a sealant (Silka Pronto 19 or equivalent), and recoated with one coat of urethane sealant (Tennant No. 122). All storage areas are surrounded by a 1" x 1" x 1/8" angle iron dike set in a chemically resistant elastomeric sealant. The floors are 0.8 feet thick and constructed out of concrete.

X-7725 Container Storage Unit

The X-7725 Storage Unit was originally designed and intended for the Gaseous Centrifuge Enrichment Plant (GCEP). After the GCEP was canceled, the X-7725 Building was selected to be upgraded to a RCRA-permitted hazardous waste storage warehouse since it has a large area of floor space kept under climate-controlled conditions and can meet applicable Part 264 RCRA standards. The building consists of five floors with 20 acres of total floor space, approximately 9 acres of which are suitable for waste storage. There are areas for receiving and storing materials, testing and inspection of parts, and manufacturing/assembly of machines. Consequently, the building is divided into a number of rooms, staging areas, open bays, and offices.

The area immediately surrounding the building has been graded to prevent run-on of rainwater. The X-7725 Building has built-up roofing over rigid insulation and metal decking. Room and bay ceiling heights range from 11 feet to 75 feet. Each level of the roof is designed to direct rainwater drainage to metal down-spouts, which discharge to a storm sewer. The flooring is constructed of reinforced concrete slabs varying from 6 to 17 inches thick. The entire building is climate-controlled.

The waste that may be stored in the X-7725 RCRA unit are the following: product and process waste designated as RCRA types F, P and U, RCRA characteristic wastes, "mixed wastes" (both radioactive and hazardous wastes) and combinations of the above wastes. The majority of the wastes stored in the X-7725 Building are from environmental restoration activities and non-halogenated solvents and/or radioactive wastes from laboratories, decontamination solutions, and a variety of plant processes and clean-up operations. The remainder of the wastes are from a variety of diffusion process activities and are primarily toxic due to metal and solvent constituents.

The wastes are primarily stored in new DOT approved 55-gallon drums, 5 inch diameter/10 liter polyethylene bottle, or 4'x4'x6' boxes. Containers are elevated during storage to prevent contact with potentially inadvertent standing liquid introduced into the area.

RCRA storage areas located on the first and fourth floor of the X-7725 Building have been modified to accommodate mixed waste storage. The modifications involved:

- Diking to an appropriate curb height,
- Sealing floor cracks/joints,
- Making special provisions for nuclear criticality safety where required,
- Upgrading the electrical, fire protection, and HVAC systems,

SUBMISSION DATE: April 30, 2002

- Coating with an "impervious" sealant,
- and providing vehicle and pedestrian ramps.

All storage areas of the X-7725 Building have dikes to ensure an adequate containment capacity of 10% of the total waste volume stored and 25% of the total where Toxic Substance Control Act wastes are stored. The floor of the X-7725 Building is free of cracks and gaps. Rough or spalled areas of the floor are repaired with a polymer-modified portland cement. Cracks in the floor are sealed with a modified-methacrylate cracks/healer/penetrating sealer or an epoxy injection adhesive as appropriate for the number and size of the cracks. Expansion joint gaps are filled with a polyurethane elastomeric sealant. Control joint gaps are filled with a flexible epoxy control joint sealer/adhesive. To further ensure the base is capable of containing any liquids which may accumulate, the floors in all storage areas are sealed with a chemically resistant sealant before any wastes are stored in these areas.

G-2 Emergency Coordinators [OAC 3745-54-52 (D), 3745-54-55]

The primary contact as Emergency Coordinator is Lewis C. Goidell. However, at PORTS alternates are referred to as Plant Shift Superintendents, who are on duty 24-hours a day and serve as Emergency Coordinator while on duty. The Plant Shift Superintendent is a USEC employee and serves as an alternate through an agreement between Bechtel Jacobs Company LLC and USEC. A Plant Shift Superintendent is on duty 24 hours a day. When the Plant Shift Superintendent responds to an incident scene and takes charge, he becomes the Incident Commander. The Plant Shift Superintendent is the on-site expert in emergency response procedures and has the responsibility of notifying the proper authorities for assistance. The responsibilities of the incident commander, as well as the notification procedures, are stated in this contingency plan. The Incident Commander has full authorization to commit all necessary resources to alleviate the emergency. Additionally, individuals have been identified by the primary contact that will respond if additional personnel are needed.

In the event of an emergency, the telephone number that will reach the on-duty Plant Shift Superintendent from an offsite phone is (740) 897-3025. If the caller is onsite, he/she would call the Plant Shift Superintendent at extension 3025. Onsite personnel can notify emergency responders by calling the plant emergency extension, 911 on any plant telephone.

The Plant Shift Superintendent is delegated the responsibility by PORTS management, to supervise site emergency response activities on all shifts. The Plant Shift Superintendent is authorized to make protective action recommendations for both onsite personnel and offsite populations.

The PORTS Emergency Response Organization (ERO) is staffed with trained personnel with expertise in responding to emergency situations. The Emergency Response Organization is at the service of the Plant Shift Superintendent when acting as the Incident Commander.

United States Enrichment Corporation Plant Shift Superintendents provide coverage at PORTS. The names of the Emergency Coordinators (Plant Shift Superintendents) are shown in Table G-1.

G-3 Implementation [OAC 3745-54-51(B), 3745-54-56(A), 3745-54-56(D)]

The Contingency Plan is to be implemented immediately whenever a condition arises that may threaten human health or the environment as a result or potential result of the involvement of hazardous wastes. These conditions include unplanned sudden or non-sudden releases, fires, or explosions.

Any person discovering an emergency involving hazardous waste onsite should immediately implement the Contingency Plan by alerting the Plant Shift Superintendent/Incident Commander and the Plant Emergency Response Organization. Methods used to alert the Plant Shift Superintendent and thereby implement the plan include:

1. Radio to X-300 Plant Shift Superintendent; or,

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Lewis C. Goidell	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Vanderpool	Non-responsive	Non-responsive	Non-responsive
Rick Larson			
Keith Williamson			
Ron P. Crabtree			
Gary Salyers			
Kurt Sisler			
Steven W. May			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator.

Table G-2 Site Emergency Equipment

EQUIPMENT DESCRIPTION	AMOUNT	LOCATION	PURPOSE
SPRINKLER SYSTEMS	≈80	X-326	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈350	X-326	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
BUILDING HORNS	>10	X-326	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-326	ALLOWS TWO WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATIONS, ETC.
COMMERCIAL TELEPHONES	>6	X-326	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
TOWELS, MOPS, BUCKETS, ETC.	1	X-326	SPILL CLEAN-UP
DRUM PUMP	1	X-326	LIQUID WASTE TRANSFER
LARGE SPILL CABINET	1	X-326	FOR SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
PH METER	1	X-7725	USED TO IDENTIFY PH OF MATERIAL
LARGE SPILL CART	4	X-7725	FOR MOVING SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
SPRINKLER SYSTEMS	21	X-7725	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈200	X-7725	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
PUBLIC ADDRESS SYSTEM	1	X-7725	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-7725	ALLOWS TWO-WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATION, ETC.
COMMERCIAL TELEPHONES	>10	X-7725	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
DRUM PUMPS	2	X-7725	LIQUID WASTE TRANSFER
SHOVELS, MOPS, BUCKETS, ETC.	1	X-7725	SPILL CLEAN-UP



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

October 25, 2001
EM-97-0182

Mr. Christopher Jones, Director
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Jones:

**U.S. DOE HAZARDOUS WASTE PERMIT OH78970008983 / 04-66-0680 CLASS I
MODIFICATIONS**

The U.S. Department of Energy (DOE) is requesting Class I modifications to our Hazardous Waste Permit (OH78970008983 / 04-66-0680) which require the Director's prior approval. The enclosed modifications revise three permit conditions in the renewed Ohio Hazardous Waste Facility Installation and Operation Permit journalized and issued on March 15, 2001, which were appealed by DOE and Bechtel Jacobs Company LLC on April 11, 2001. The specific changes to the permit conditions are described below.

1. General Permit Condition A.28(a) should be amended by deleting "*and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-47*" so as to make the paragraph read as follows:
 - (a) *The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, the following documents (including amendments, revisions and modifications):*

DOE and its contractor, Bechtel Jacobs Company LLC, are specifically exempt from financial requirements per OAC Rule 3745-55-40(C).

2. General Permit Condition A.28(a)(iv) should be deleted. DOE and its contractor, Bechtel Jacobs Company LLC, are specifically exempt from Financial requirements per OAC Rule 3745-55-40(C).

3. General Permit Condition C.7. should be amended by replacing the existing text so as to make consistent with General Permit Condition B.2(b) as follows:

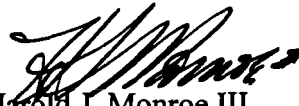
The Permittee may not receive hazardous waste or mixed waste from off-site other than as described in Section C-2E of the Part B application.

4. General Permit Condition E.1. should be amended to delete the last paragraph starting with "In the event..." This deletion is per agreement between DOE, Bechtel Jacobs Company LLC, and Ohio EPA.

This submittal provides replacement pages for the permit, including both strike-out pages that identify the specific language to be removed from the permit as well as revised language (capitalized) and clean-copy replacement pages. Also enclosed is the certification statement as required by OAC Rule 3745-50-42(D).

DOE appreciates Ohio EPA's efforts in working with us to maintain the site's Hazardous Waste Permit. If you have any questions or need additional information about the modification, please contact Melda Rafferty at (740) 897-5521.

Sincerely,



Harold J. Monroe III
Acting Site Manager
Portsmouth Site Office

Enclosures

cc w/enclosure:

Administrative Records

Harriet Croke, USEPA, Region V

Thomas Crepeau, Ohio EPA/COL

Frances Kovac, Ohio EPA/COL

Melody Stewart, OHIO EPA/SEDO(2)


Ray Miskelley, CC-10/ORO

cc w/o enclosure:

Gil Drexel, BJC/PORTS

Certification Statement


I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office



Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC



Date

**STRIKE-OUT
REVISION PAGES**

A.27. Reserved

A.28. Information to be Maintained at the Facility
OAC Rule 3745-54-74

- (a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, ~~and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-47,~~ the following documents (including amendments, revisions and modifications):
 - (i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;
 - (ii) contingency plan developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;
 - (iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;
 - (iv) ~~cost estimate for facility closure developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;~~
 - (vIV) personnel training plan and the training records, as developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;
 - (viV) operating record required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and
 - (viiVI) inspection schedules developed in accordance with OAC Rules 3745-54-15; 3745-55-74 and 3745-55-95; and the terms and conditions of this permit.
- (b) All amendments, revisions and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Director. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

- (c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.29. Waste Minimization Report
OAC Rule 3745-54-73

- (a) The Permittee shall submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(B) at least once every two years. The provision of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied annually.
- (b) In completing this report, the Permittee should refer to the following information: instructions prepared by the Ohio EPA for completing the Waste Minimization Annual Report required by OAC Rules 3745-54-75(H), (I), and (J); the Federal Register notice of May 28, 1993, vol. 58, p. 31114, "Interim Final Guidance: Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program"; and U.S. EPA's "Facility Pollution Prevention Guide" including planning and organization, assessment, feasibility analysis, implementation, measuring progress, and maintaining the program.
- (c) The Permittee shall submit the Waste Minimization Report to the Technical Assistance Section, Office of Pollution Prevention within one hundred eighty (180) days of journalization of this permit, and shall submit updates to this report biennially thereafter.

C.6. Containment Systems.

OAC Rule 3745-55-75; ORC Section 3734.05(H)

- (a) The Permittee shall construct and maintain the containment system in accordance with the plans and specifications contained in Section D of the Part B permit application.
- (b) The Permittee shall maintain the containment system as described in the approved Part B permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system shall be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed. The Permittee shall insure that the coatings utilized in lining the secondary containment systems is compatible with each waste stored in containers situated at the permitted Container Storage Areas. For those hazardous wastes or mixed wastes that are deemed incompatible with the liner material the Permittee shall install a separate secondary containment structure, located within the existing structure, possessing the appropriate liner in order to withstand any degrading effects imposed through initial and/or prolonged contact (e.g., 24 hours) with released waste materials.
- (c) Spilled or leaked waste and accumulated precipitation shall be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty-four (24) hours from the time spilled and/or leaked waste is discovered to have reached the hazardous waste pad sump.

C.7. Prohibition of Container Storage

ORC Section 3734.02(F)

~~The Permittee shall not store any container of hazardous waste received from any off-site source.~~

THE PERMITTEE MAY NOT RECEIVE HAZARDOUS WASTE OR MIXED WASTE FROM OFF-SITE OTHER THAN AS DESCRIBED IN SECTION C-2E OF THE PART B APPLICATION.

C.8. Inspection Schedules and Procedures

OAC Rules 3745-54-15, and 3745-54-73

As required by OAC Rule 3745-54-15, the Permittee shall inspect the container storage area in accordance with the approved inspection schedule contained in

MODULE E - CORRECTIVE ACTION REQUIREMENTS

E.1. CORRECTIVE ACTION AT THE FACILITY OAC Rules 3745-50-10 & 3745-55-011

Corrective Action is currently being addressed pursuant to the September 1, 1989, Consent Decree ("Consent Decree") issued by the U.S. District Court for the Southern District of Ohio (Civil Action No. C2-89-732) and the August 4, 1994, Administrative Order by Consent, Docket No. V-W-90-R-03, to which Ohio and USEPA are parties. For as long as the Permittee remains in compliance with the Consent Decree, the Corrective Action obligations of the permit are met. In the event that the Consent Decree is violated, and/or the Corrective Action fails, is incomplete, or otherwise does not address corrective actions needed at waste management units, Ohio EPA reserves the right to modify the permit to require specific Corrective Action at the Facility.

~~In the event that any Corrective Action required at the Facility requires the implementation of a land use restriction for all or part of the Facility, it is contemplated that at the time that the specific requirements of a land use restriction can be determined, Director's Final Findings and Orders, on consent, will be issued which: 1) create an equitable servitude upon the property, or portion thereof, which limits the use of the land as required by the approved Corrective Action, and demonstrate the agreement between the landowner and Ohio EPA to create such an equitable servitude; 2) require the landowner to file notice of the equitable servitude with the County Recorder's Office; 3) require the landowner to place the deed restriction into the deed at the time of the next transaction on the property, and; 4) contain, as an attachment or otherwise, the specific, agreed-upon language of the land use restriction itself.~~

**CLEAN COPY
REPLACEMENT PAGES**

A.27. Reserved

A.28. Information to be Maintained at the Facility
OAC Rule 3745-54-74

- (a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, the following documents (including amendments, revisions and modifications):
 - (i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;
 - (ii) contingency plan developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;
 - (iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;
 - (iv) personnel training plan and the training records, as developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;
 - (v) operating record required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and
 - (vi) inspection schedules developed in accordance with OAC Rules 3745-54-15; 3745-55-74 and 3745-55-95; and the terms and conditions of this permit.
- (b) All amendments, revisions and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Director. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.
- (c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.29. Waste Minimization Report
OAC Rule 3745-54-73

- (a) The Permittee shall submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(B) at least once every two years. The provision of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied annually.
- (b) In completing this report, the Permittee should refer to the following information: instructions prepared by the Ohio EPA for completing the Waste Minimization Annual Report required by OAC Rules 3745-54-75(H), (I), and (J); the Federal Register notice of May 28, 1993, vol. 58, p. 31114, "Interim Final Guidance: Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program"; and U.S. EPA's "Facility Pollution Prevention Guide" including planning and organization, assessment, feasibility analysis, implementation, measuring progress, and maintaining the program.
- (c) The Permittee shall submit the Waste Minimization Report to the Technical Assistance Section, Office of Pollution Prevention within one hundred eighty (180) days of journalization of this permit, and shall submit updates to this report biennially thereafter.

C.6. Containment Systems.

OAC Rule 3745-55-75; ORC Section 3734.05(H)

- (a) The Permittee shall construct and maintain the containment system in accordance with the plans and specifications contained in Section D of the Part B permit application.
- (b) The Permittee shall maintain the containment system as described in the approved Part B permit application, designed with sufficient capacity to contain ten percent of the total volume of the containers or the volume of the largest container, whichever is greater. The containment system shall be free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed. The Permittee shall insure that the coatings utilized in lining the secondary containment systems is compatible with each waste stored in containers situated at the permitted Container Storage Areas. For those hazardous wastes or mixed wastes that are deemed incompatible with the liner material the Permittee shall install a separate secondary containment structure, located within the existing structure, possessing the appropriate liner in order to withstand any degrading effects imposed through initial and/or prolonged contact (e.g., 24 hours) with released waste materials.
- (c) Spilled or leaked waste and accumulated precipitation shall be removed from the sump or collection area in a timely manner. This time period is not to exceed twenty-four (24) hours from the time spilled and/or leaked waste is discovered to have reached the hazardous waste pad sump.

C.7. Prohibition of Container Storage

ORC Section 3734.02(F)

The Permittee may not receive hazardous waste or mixed waste from off-site other than as described in Section C-2E of the Part B application.

C.8. Inspection Schedules and Procedures

OAC Rules 3745-54-15, and 3745-54-73

As required by OAC Rule 3745-54-15, the Permittee shall inspect the container storage area in accordance with the approved inspection schedule contained in Section F of the Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion or other factors. The Permittee shall note the results of these inspections in the inspection log

MODULE E - CORRECTIVE ACTION REQUIREMENTS

E.1. CORRECTIVE ACTION AT THE FACILITY OAC Rules 3745-50-10 & 3745-55-011

Corrective Action is currently being addressed pursuant to the September 1, 1989, Consent Decree ("Consent Decree") issued by the U.S. District Court for the Southern District of Ohio (Civil Action No. C2-89-732) and the August 4, 1994, Administrative Order by Consent, Docket No. V-W-90-R-03, to which Ohio and USEPA are parties.

For as long as the Permittee remains in compliance with the Consent Decree, the Corrective Action obligations of the permit are met. In the event that the Consent Decree is violated, and/or the Corrective Action fails, is incomplete, or otherwise does not address corrective actions needed at waste management units, Ohio EPA reserves the right to modify the permit to require specific Corrective Action at the Facility.



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

RECEIVED

OCT 11 2001

August 28, 2001
EM-97-0115

WASTE MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138-9031

Dear Ms. Stewart:

**U. S. DOE HAZARDOUS WASTE PERMIT OH789008983 / 04-66-0680 - CLASS 1
MODIFICATION**

OH7 890 008 983

The U. S. Department of Energy (DOE) is requesting a Class 1 modification to our Hazardous Waste Permit OH 789008983 / 04-66-0680. The enclosed modification is provided in accordance with OAC 3745-50-51, and revises the list of Emergency Coordinators in Section G, Table G-1 of the Contingency Plan in the permit renewal application. Specifically, one USEC Plant Shift Superintendent was replaced (Rick Larson replaced Joseph B. Halcomb), and the home telephone number for Kurt Sisler was updated.

A clean copy replacement page is provided for insertion in the permit renewal application. A strike out copy of the change and a table summary of the permit changes are not provided due to the simplicity of this modification. Table G-1 now bears the page header "SUBMISSION DATE: August 31, 2001." Please note that because the permit application is printed double-sided, Table G-2, which has not changed, bears the header "SUBMISSION DATE: July 13, 2001." Also enclosed is the certification statement as required by OAC 3745-50-42(D).

If you have any questions or need additional information about the modification, please contact Melda Rafferty at (740) 897-5521.

Sincerely,

Sharon J. Robinson
Site Manager
Portsmouth Site Office

Enclosures

cc w/enclosure:
Harriet Croke, USEPA, Region V
Thomas Crepeau, Ohio EPA
Administrative Record

cc w/o enclosure:
John Harmon, BJC/PORTS

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office

8/28/01
Date



Gilbert D. Drexel
Manager of Projects
Bechtel Jacobs Company LLC

8/27/2001
Date

Please insert in Section G, Contingency Plan

Table G-1
Portsmouth Gaseous Diffusion Plant Emergency Coordinators
(Plant Shift Superintendents)

NAME	ADDRESS	HOME TELEPHONE NUMBER	PAGER TELEPHONE NUMBER
PRIMARY CONTACT¹			
Don J. Wilkes	Non-responsive	Non-responsive	Non-responsive
PLANT SHIFT SUPERINTENDENTS (PSS)			
Keith Vanderpool	Non-responsive	Non-responsive	Non-responsive
Rick Larson			
Keith Williamson			
Ron P. Crabtree			
Kurt Sisler			
Steven W. May			

¹After the Primary Contact, the Plant Shift Superintendent on duty at the time of an incident will be the Emergency Coordinator

Table G-2 Site Emergency Equipment

EQUIPMENT DESCRIPTION	AMOUNT	LOCATION	PURPOSE
SPRINKLER SYSTEMS	≈80	X-326	CAPABLE OF CONTROLLING FIRES BY WATER FLOW
FIRE EXTINGUISHERS	≈350	X-326	FOR USE IN EXTINGUISHING CLASS A, B, OR C FIRES
BUILDING HORNS	>10	X-326	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-326	ALLOWS TWO WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATIONS, ETC.
COMMERCIAL TELEPHONES	>6	X-326	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
TOWELS, MOPS, BUCKETS, ETC.	1	X-326	SPILL CLEAN-UP
DRUM PUMP	1	X-326	LIQUID WASTE TRANSFER
LARGE SPILL CABINET	1	X-326	FOR SPILL CONTROL MATERIALS (ABSORBENT, PPE, ETC.)
PH METER	1	X-7725	USED TO IDENTIFY PH OF MATERIAL
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PUBLIC ADDRESS SYSTEM	1	X-7725	FOR ACTIVATING THE EMERGENCY RESPONSE ORGANIZATION, ALERTING EMPLOYEES TO RESPOND ACCORDING TO THE NATURE OF THE EMERGENCY
PLANT RADIO FREQUENCIES	5	X-7725	ALLOWS TWO-WAY COMMUNICATIONS BETWEEN EMPLOYEES, EMERGENCY RESPONSE ORGANIZATION, ETC.
COMMERCIAL TELEPHONES	>10	X-7725	CAPABLE OF NOTIFYING ON-SITE EMPLOYEES AND OFF-SITE AGENCIES
DRUM PUMPS	2	X-7725	LIQUID WASTE TRANSFER
SHOVELS, MOPS, BUCKETS, ETC.	1	X-7725	SPILL CLEAN-UP



Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

July 17, 2001
EM-97-0068

RECEIVED
JUL 31 2001

WASTE MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Ms. Melody Stewart
Ohio EPA
Southeast District Office
2195 Front Street
Logan, OH 43138-9031

Dear Ms. Stewart:

OH 590008983

CLASS I RCRA PART B PERMIT MODIFICATIONS

The U.S. Department of Energy (DOE) is requesting the enclosed Class 1 modifications to the DOE-Portsmouth Gaseous Diffusion Plant (PORTS) Hazardous Waste Permit 04-57-0680/OH7890008983. The modifications include 1) revisions to several sections of the permit renewal application that describe the heating and cooling systems for the permitted storage areas, and 2) updates of facility information, including Emergency Coordinators, in Section G (Contingency Plan) of the permit renewal application.

The following items are included in this submittal:

- Certification statement as required by OAC 3745-50-42(D)
- A table summarizing and explaining the modifications made to the RCRA Part B Permit
- Replacement pages for the permit renewal application
- Overstrike pages corresponding to the replacement pages for the permit renewal application that delineate the changes made to the permit renewal application

Old language that has been removed from the permit application has been overstruck and new text is capitalized. Replacement pages that have changed have the page header "SUBMISSION DATE: July 13, 2001". Please note that because the permit application is printed double-sided, pages that have not been changed still bear the header "SUBMISSION DATE: February 21, 2000".

Both overstrike pages and replacement pages are included in this submittal. The overstrike pages are provided solely to aid Ohio EPA in identifying the changes made to the permit renewal application and should not be added to the permit renewal application. The replacement pages are clean copies (i.e., overstruck language has been removed and capitalized text has been changed to upper/lower case). These clean-copy replacement pages should be inserted in the permit renewal application.

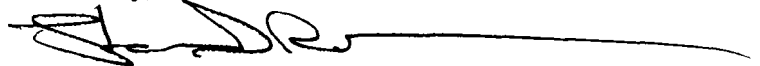
July 17, 2001

Replacement pages for the permit renewal application are provided as follows:

- A replacement page for Volume 1, Section B: This page deletes specific language that describes the heating/cooling system for the X-7725 Container Storage Areas. While the entire building will continue to be climate controlled, heating and cooling will not continue to be provided by the specific system described. The existing page should be removed and replaced with the new page dated July 13, 2001.
- Replacement pages for Volume 1, Section G: DOE has prepared a completely revised Section G that updates facility information, including the Emergency Coordinators. The entire Section G should be removed and replaced with the new Section G dated July 13, 2001.
- Replacement pages for Volume 4, Appendix I-1, Closure Plan for the X-326 Storage Unit: Replacement pages are provided for the cover page and Section 1. The existing pages should be removed and replaced with the new pages dated July 13, 2001.
- Replacement pages for Volume 4, Appendix I-2, Closure Plan for the X-7725 Storage Unit: Replacement pages are provided for the cover page and Section 1. The existing pages should be removed and replaced with the new pages dated July 13, 2001.

The Department of Energy appreciates Ohio EPA's efforts in working with us to maintain the site's Part B Permit. If you have any questions or need additional information, please contact Melda Rafferty at (740) 897-5521.

Sincerely,



Sharon J. Robinson
Site Manager
Portsmouth Site Office

Enclosures

cc w/enclosures:

Harriet Croke, U.S. EPA, Region 5

Thomas Crepeau, Ohio EPA

Administrative Records

cc w/o enclosures:

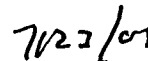
J. Harmon, BJC/PORTS

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



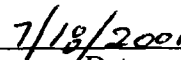
Sharon J. Robinson
Site Manager
Department of Energy
Portsmouth Site Office



Date



John Harmon
Deputy Manager of Projects
Bechtel Jacobs Company LLC



Date



State of Ohio Environmental Protection Agency

STREET ADDRESS:

800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

***Certified Mail
Return Receipt Requested***

***Re: U.S. DOE Portsmouth
U.S. EPA ID #: OH 789 000 8983
Ohio ID #: 04-66-0680***

November 27, 1998

Mr. Eugene Gillespie
Site Manager
U.S. Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700

Dear Mr. Gillespie:

The May 1, 1998 Class 3 Permit Modification request has been reviewed by the staff of the Division of Hazardous Waste Management (DHWM). Your request to change the name of the permit co-operator and change the name of the project manager has been classified as a modification to the current permit. It is the recommendation of the staff that the Director issue a draft hazardous waste permit modification since the proposed changes to the permit appear to comply with applicable hazardous waste rules.

Therefore, enclosed please find a Modified Ohio Hazardous Waste Facility Installation and Operation Permit which is being issued to U.S. DOE Portsmouth today in draft form in accordance with the requirements of Rule 3745-50-51 of the Ohio Administrative Code (OAC).

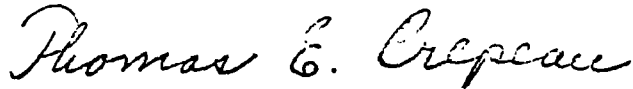
A public notice concerning the issuance of the draft permit modification will appear on November 29, 1998 in the News Watchman newspaper. Written comments relevant to the permit application and the draft permit modification and/or a request for a public hearing will be accepted within forty-five (45) days of the date of the public notice. A public announcement in similar form will be made over a local radio station. Written comments may be submitted before the close of the public comment period by mailing comments to Ohio EPA, Division of Hazardous Waste Management, Attn: Thomas E. Crepeau, P.O. Box 1049, Columbus, Ohio, 43216-1049, (614)644-2977.

Within sixty (60) days of the public hearing or the close of the public comment period, the Director of the Ohio EPA may issue a final permit modification upon such terms and conditions as may be found necessary to ensure that the operation, maintenance, closure and post-closure care of your facility are in accordance with Ohio's hazardous waste rules.

*Mr. Eugene Gillespie
U.S. DOE Portsmouth
Page 2*

If you have any questions concerning the draft Ohio permit modification, please call Donna Goodman of the Southeast District Office at (740) 385-8501.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas E. Crepeau".

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc: Edwin Lim, RECS, DHWM, CO
Jeremy Carroll, RECS, DHWM, CO
Harriet Croke, USEPA, Region 5 ✓
Raymond Roe, HWFB
Dave Chenault, DHWM, SEDO
Donna Goodman, DHWM, SEDO
Beth Gianforcaro, PIC, Ohio EPA
file

PUBLIC NOTICE

PIKE COUNTY

ISSUANCE OF OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION DRAFT PERMIT MODIFICATION

Notice is hereby given that, on November 27, 1998, the Director will issue a Class 3 modification Ohio Hazardous Waste Facility Installation and Operation Permit, in draft form, to U.S. Department of Energy, Portsmouth Gaseous Diffusion Plant (DOE Ports), located at 3930 U.S. Route 23 South, Piketon, Ohio 45661, U.S. EPA I.D. No. OH7890008983, Ohio I.D. No. 04-66-0680. The draft Class 3 permit modification would allow DOE Ports to change the name of the co-operator to Bechtel Jacobs Company LLC, and change the project manager's name.

U.S. DOE Portsmouth is engaged in the enrichment of uranium for use as nuclear fuel. Wastes are stored in building X-326 which contains high assay uranium, and building X-7725 which stores RCRA hazardous wastes, mixed wastes and low level radioactive waste.. The owner of the facility is the United States Department of Energy, Portsmouth Gaseous Diffusion Plant.

A copy of the draft permit modification may be reviewed at the Ohio EPA, Southeast District Office, 2195 Front Street, Logan, Ohio 43138, Tel: (740) 385-8501, and the U.S. DOE Environmental Information Center, 505 West Emmitt Avenue, Suite 3, Waverly, Ohio 45690. Comments concerning the draft permit modification or request of a public hearing may be submitted to the Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section, P.O. Box 1049, Columbus, Ohio 43216-1049, tel.: (614) 644-2977, fax: (614) 728-1245, or via e-mail at: dhwmcomments@epa.state.oh.us Comments must be received within 45 days of the date of this notice, November 29, 1998.

The public comment period extends from November 29, 1998 to January 12, 1999. After the close of the public comment period and before issuing a final permit decision, the Ohio EPA will evaluate all comments received and the final permit decisions will be communicated to the applicant and those individuals who submitted written comments.

FACT SHEET
(Ohio Administrative Code Rule 3745-50-22)

Draft Modified Permit
(Ohio Administrative Code Rule 3745-50-51)

Facility Name:	United States Department of Energy Portsmouth Gaseous Diffusion Plant
U.S. EPA I.D. Number:	OH 789 000 8983
Ohio Permit Number:	04-66-0680
Location:	3930 U.S. Route 23 South Piketon, Ohio 45661
Facility Owner:	U.S. Department of Energy PO Box 700 Piketon, Ohio 45661-0700
Facility Operator:	U.S. Department of Energy PO Box 700 Piketon, Ohio 45661-0700
Facility Co-operator:	Lockheed Martin Energy Systems PO Box 628 Piketon, Ohio 45661
Activity Described in Modification Application:	Change in permit co-operator and project manager.
Comment Period:	Begins: November 29, 1998 Ends: January 12, 1999

All persons including the applicant may submit written comments relating to this draft action. The comment period begins on November 29, 1998, and ends on January 12, 1999. A copy of the permit application and the draft permit is available for review by the public at the following locations:

USDOE Environmental Information Center
505 West Emmitt Avenue, Suite 3
Waverly, Ohio 45690

Ohio EPA, Southeast District Office
2195 Front Street
Logan, Ohio 43138
740/385-8501

Ohio EPA, Central Office
Division of Hazardous Waste Management
1800 Watermark Drive
Columbus, Ohio 43215-1099
(614) 644-2917

Two copies of such comments should be sent to the Ohio EPA, Division of Hazardous Waste Management, Data Management Section, Attn: Thomas E. Crepeau, P.O. Box 1049, Columbus, Ohio 43216-1049, (614)644-2977.

Public Meeting Procedures

Written comments or requests for a public hearing may be submitted before the end of the comment period to the Ohio EPA, Division of Hazardous Waste Management, Data Management Section, Attn: Thomas E. Crepeau, P.O. Box 1049, Columbus, Ohio 43216-1049, (614) 644-2977.

Within sixty days of the close of the public comment period, the Ohio EPA will, without prior hearing, issue a modified permit or deny the modification request in accordance with Chapter 3734 of the Revised Code. If the Ohio EPA approves the application, a modified permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

Description of Facility

The Portsmouth Gaseous Diffusion Plant enriches uranium for use as nuclear fuel. Wastes are stored in two buildings. The X-326 storage facility contains high assay uranium bearing hazardous and/or PCB wastes generated from plant operations until they can be further processed for uranium recovery or treatment. These include aqueous laboratory solutions, spent lab solvents and decontamination solutions. The storage facility consists of 31,888 square feet of space divided up into 6 areas. The storage capacity of this facility is 133,540 gallons.

The X-7725 storage building contains 9 acres of floor space divided into 22 areas to be used for storage of RCRA hazardous and mixed wastes, as well as low level radioactive waste, PCB's and asbestos wastes. These include solids and liquids generated from plant operations and the on-site cleanup. The maximum storage capacity of this facility is 5,456,142 gallons.

Description of Requested Permit Modification

Pursuant to a change in contract awards Bechtel Jacobs LLC proposes to co-operate the facility with U.S. Department of Energy replacing Lockheed Martin Energy Systems (LMES). All references to Lockheed Martin Energy Systems within the permit and permit application are replaced with the new-co-operator, Bechtel Jacobs Company LLC, with the exception of Section K, page K-1. References to Bechtel Jacobs Company LLC apply only to the practice of the strategy on page K-1. The LMES site manager is replaced in the permit and application to the Bechtel Jacobs Company LLC project manager, John Shoemaker.

Regulatory Basis to Support the Decision to Modify the Permit Application

When applying for a Class 3 permit modification, an applicant (The U.S. Department of Energy Portsmouth Gaseous Diffusion Plant) is required (by OAC Rule 3745-50-51(D)) to submit the relevant informational requirements of OAC Rule 3745-50-43 (Part A application contents), OAC Rule 3745-50-44 (Part B application contents) and OAC Rule 3745-50-52 (Compliance History). The U.S. Department of Energy Portsmouth Gaseous Diffusion Plant submitted a Class 3 modification application with the relevant required information on May 1, 1998. The Ohio EPA has reviewed the application and has determined that the proposal complies with Ohio EPA rules.

Accordingly, the Ohio EPA is issuing a draft action indicating the Director's intention with respect to the issuance of a modified permit to The U.S. Department of Energy Portsmouth Gaseous Diffusion Plant.

Contact Person

For additional information, please contact Donna Goodman at (740)-380-5293.

DRAFT

OHIO ENVIRONMENTAL PROTECTION AGENCY

**MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**

Date of Issuance:

Effective Date:

U.S. EPA ID No.: OH7890008983

Ohio Permit No.: 04-66-0680

Name of Permittee: *United States Department of Energy and
Bechtel Jacobs Company LLC*

Mailing Address: *U.S. DOE - Portsmouth
P.O. Box 700
Piketon, OH 45661*

Facility Location: *3930 U.S. Route 23 South
Piketon, Ohio 45661*

Person to Contact: *Eugene Gillespie, DOE Site Manager*

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above referenced permit number as issued by the Ohio Hazardous Waste Facility Board and journalized on August 21, 1995 is hereby incorporated by reference in its entirety except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

The permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on May 1, 1998. The information contained in the revised Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions found on page 1 supersede and replace the corresponding page found in the August 21, 1995 hazardous waste permit.

Donald R. Schregardus
Director

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT

Permittees: **United States Department of Energy and ~~Lockheed Martin Energy Systems~~**
Bechtel Jacobs Company LLC

Mailing

Address: P.O. Box 700
Piketon, Ohio 45661-0700

Ohio ID: 04-66-0680

US EPA ID: OH 789 000 8983

Owner: United States Department of Energy
P.O. Box 700
Piketon, Ohio 45661-0700

Issue Date: 07/21/1995

Operator: United States Department of Energy
P.O. Box 628
Piketon, Ohio 45661

Effective Date: 08/21/1995

Expiration Date: 08/21/2000

Co-operator: ~~Lockheed Martin Energy Systems~~
Bechtel Jacobs Company LLC
P.O. Box 628
Piketon, Ohio 45661

Location: 3930 U.S. Route 23 South
Piketon, Ohio 45661

AUTHORIZED ACTIVITIES

In reference to the application of **U.S. Department of Energy and ~~Lockheed Martin Energy Systems~~ Bechtel Jacobs LLC**, for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

Container Storage of Hazardous Waste**PERMIT APPROVAL**

Donald R. Schregardus, Director
Ohio Environmental Protection Agency

This permit approval is based upon the record in this matter which is maintained at the offices of the Ohio Environmental Protection Agency. The Director has considered the application, accompanying information, inspection reports of the facility, a report regarding the facility's compliance or noncompliance with the terms and conditions of its permit and rules adopted by the Director under this chapter, and such other information as is relevant to the operation of the facility. The Director has determined that the facility under the existing permit has a history of compliance with ORC Chapter 3734, rules adopted under it, the existing permit, or orders entered to enforce such requirements that demonstrate sufficient reliability, expertise, and competency to operate the facility henceforth under this chapter, rules adopted under it, and the renewal permit.

Entered in to the Journal of the Director this _____ day of _____, 1999.


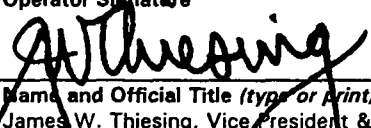
By _____ of the Ohio Environmental Protection Agency.

DRAFT

EPA I.D. Number <i>(enter from page 1)</i>		Secondary I.D. Number <i>(enter from page 1)</i>	
OH7890008983			
VII. Operator Information <i>(see instructions)</i>			
A. Name of Operator			
U. S. Department of Energy Bechtel Jacobs Company, Co-Operator			
Street or P. O. Box			
P. O. Box 628			
City or Town		State	ZIP Code
Piketon		Ohio	45661
Phone Number <i>(area code and number)</i>		B. Operator Type	C. Change of Operator Indicator
(614) 897-5010 (DOE) (614) 897-2331 (BJC)		F	Yes X No
VIII. Facility Owner <i>(see instructions)</i>			
A. Name of Facility's Legal Owner			
U. S. Department of Energy			
Street or P. O. Box			
P. O. Box 700			
City or Town		State	ZIP Code
Piketon		Ohio	45661-0700
Phone Number <i>(area code and number)</i>		B. Owner Type	C. Change of Owner Indicator
(614) 897-5010		F	Yes No X
IX. SIC Codes <i>(4-digit, in order of significance)</i>			
Primary		Secondary	
2819	Industrial Inorganic Chemicals		
Secondary		Secondary	
X. Other Environmental Permits			
A. Permit Type /Number	B. Description	C. Permit	
01000000*GD	DOE NPDES Permit	Permit to Discharge	

Continued

DRAFT

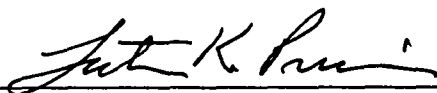
EPA I.D. Number (enter from page 1)				Secondary I.D. Number (enter from page 1)			
OH7890008983							
XIV. Description of Hazardous Waste (continued)							
E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.							
Line Number	Additional Process Codes (enter)						
XV. Map							
<p>Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</p>							
XVI. Facility Drawing							
All existing facilities must include a scale drawing of the facility (see instructions for more detail).							
XVII. Photographs							
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).							
XVIII. Certification(s)							
<p>I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.</p>							
Owner Signature						Date Signed	
						3/6/98	
Name and Official Title (type or print)							
Eugene W. Gillespie, Site Manager							
Operator Signature						Date Signed	
						3-2-98	
Name and Official Title (type or print)							
James W. Thiesing, Vice President & Deputy General Manager							
on behalf of							
Bechtel Jacobs Company, Co-Operator							
XIX. Comments							

U.S. DEPARTMENT OF ENERGY
RCRA PART B PERMIT (04-57-0680)
MODIFICATION: NAME CHANGE
APRIL 27, 1998

DRAFT

On April 1, 1998, Bechtel Jacobs Company LLC, a limited liability corporation licensed to do business in the State of Ohio on December 24, 1997, became responsible under contract with the U.S. Department of Energy to carry out day-to-day operations of the hazardous waste storage units at the Portsmouth Gaseous Diffusion Plant, formerly cooperated by Lockheed Martin Energy Systems, Inc., (LMES). All references to LMES shall be deleted and replaced with Bechtel Jacobs Company LLC, with the exception of Section K, page K-1, in which it states, "To comply with the requirements of the Clean Water Act, Martin Marietta Energy Systems, Portsmouth, has developed and practices a progressive environmental strategy for water pollution control." References to Bechtel Jacobs Company LLC applies only to the practice of the strategy.

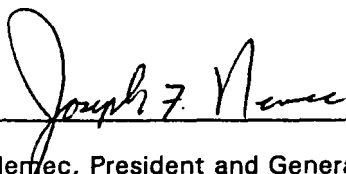
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



4/28/98

Lester K. Price, Contracting Officer Representative for Bechtel Jacobs
Company, LLC U.S. Department of Energy

Date



4/27/98

Joe Nemecek, President and General Manager, Bechtel Jacobs Company, LLC

Date



State of Ohio Environmental Protection Agency

STREET ADDRESS:

zarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

June 1, 2000

Re: U.S. DOE Portsmouth
US EPA ID No.: OH7 890 008 983
Ohio ID No.: 04-66-0680
Modified Hazardous Waste Permit

Mr. Eugene Gillespie
U.S. DOE Portsmouth
P.O. Box 700
Piketon, Ohio 45661

CERTIFIED MAIL

Dear Mr. Gillespie:

On February 18, 2000, Ohio EPA received a Class 2 permit modification application from U.S. DOE Portsmouth (tracking number: OH7890008983 - 000218-2-01). The enclosed modified hazardous waste permit is being issued to you today in final form in accordance with the requirements of Rule 3745-50-51 of the Ohio Administrative Code. Please note that the modified permit remains in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission (ERAC) pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the ERAC within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address: Environmental Review Appeals Commission, 236 E. Town Street, Room 300, Columbus, Ohio 43215.

Sincerely yours,

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/dhs

cc: Jeremy Carroll, Supervisor, EU, ERAS, DHWM
Harriet Croke, U.S. EPA, Region V
Raymond Roe, Hazardous Waste Facility Board
Dave Chenault, DHWM, SEDO
Melody Stewart, DHWM, SEDO
Public Interest Center, Ohio EPA

RECEIVED
JUN 12 2000

PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

c:\modcvr\l.wpd

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

OHIO E.P.A. **OHIO ENVIRONMENTAL PROTECTION AGENCY**

JUN - 1 2000
**MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**
ENTERED DIRECTOR'S JOURNAL

Date of Issuance: June 1, 2000
Effective Date: June 1, 2000
U.S. EPA ID No.: OH7890008983
Ohio Permit No.: 04-66-0680

Name of Permittee: U.S. DOE Portsmouth

Mailing Address: U.S. DOE Portsmouth
P.O. Box 700
Piketon, Ohio 45661

Facility Location: 3930 U.S. Route 23 South
Piketon, Ohio 45661

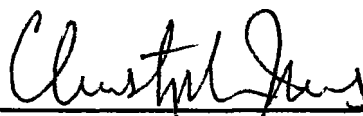
Person to Contact: Eugene Gillespie, U.S. DOE Site Manager

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on August 21, 1995 is hereby incorporated by reference in its entirety except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

The permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on February 18, 2000. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the modification permit application are hereby incorporated as express, binding terms and conditions of this modified permit.



Christopher Jones
Director

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency

By: Zona L. Clements Date: 6-1-00

**OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT**

**SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE
INSTALLATION AND OPERATION PERMIT**

U.S. DOE Portsmouth
U.S. EPA ID #: OH 789 000 8983
Ohio ID #: 04 66 0680

Modifications of the Hazardous Waste Facility Installation and Operation Permit will authorize U. S. DOE Portsmouth to make the following change:

Class 2 Modification:

1. Change in the inspection schedule in Section F, Table F-1 (Inspection Schedule).

**IDENTIFICATION AND JUSTIFICATION FOR RCRA
PART B PERMIT MODIFICATIONS**

Volume/ Section/ Page ^a	Modification	Justification	OAC/ Class ^b
Volume 1, Section B			
Vol. 1/ Sect. B-1/ pg. B-3	Removed sentence that stated "Heat is provided by recirculating heating water and cooled by chilled water systems."	The paragraph already states that the entire building (X-7725) is climate controlled. No further information is needed. Heating and cooling will not continue to be provided by this specific system.	B.1/1
Volume 1, Section G			
Vol. 1/ Sect. G/ pg. G-2	Updated list of organizations that receive a copy of the Contingency Plan.	Informational change.	B.1/1
Vol. 1/ Sect. G/ pg. G-3	Changed employment at the facility.	Informational change.	B.1/1
Vol. 1/ Sect. G-1/ pgs. G-3 & G-4	Deleted subsections entitled "Local Specifications," "Demographics," and "Meteorology." Deleted 5-mile Emergency Planning Area from "Planning Area" and "Land Use" subsections.	Information not required by regulations. Some information was outdated.	B.1/1
Vol. 1/ Sect. G-1/ pgs. G-5 & G-6	Updated description of heating/cooling systems for the permitted container storage areas. Deleted geologic information provided in descriptions of permitted container storage units.	Informational change. Geologic information not required.	B.1/1
Vol. 1/ Sect. G-2/ pg. G-7	Clarified that Plant Shift Superintendents are the Emergency Coordinators for PORTS.	Informational change.	B.1/1
Vol. 1/ Sect. G-2/ pg. G-7	Clarified that 911 must be dialed on a plant phone to reach the Plant Shift Superintendent.	Informational change.	B.1/1
Vol. 1/ Sect. G-3/ pg. G-7	Clarified that 911 must be dialed on a plant phone to reach the Plant Shift Superintendent.	Informational change.	B.1/1
Vol. 1/ Sect. G-4/ pg. G-10	Revised description of Emergency Operations Center.	Informational change.	B.1/1
Vol. 1/ Sect. G-4/ pg. G-10	In the subsection entitled "Emergency Line of Executive Succession," deleted names and revised titles.	Informational change. Names are not required as the personnel listed are not Emergency Coordinators.	B.1/1
Vol. 1/ Sect. G-4A/ pg. G-11	Stated that the Emergency Notification form shown in Figure G-3 or a form that meets RCRA regulatory requirements will be used for emergency notifications.	Allows operational flexibility to make editorial changes to the form or add additional information to the form without requiring a permit modification.	B.1/1
Vol. 1/ Sect. G-4B/ pg. G-12	Revised last sentence of section to state that radiological analyses will be performed in accordance with laboratory analytical methods/standard operating procedures.	If samples required analysis by an outside laboratory, PORTS laboratory methods would not be used. Standard laboratory methods (e.g., SW-846) do not exist for most radiological analyses.	B.1/1

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Vol. 1/ Sect. G-4C/ pg. G-13	Deleted reference to five-mile planning area in subsection entitled "Off-Site Sheltering In-Place."	Informational change.	B.1/1
Vol. 1/ Sect. G-4F/ pg. G-16	Revised fourth paragraph in this section to state that recovered waste will be characterized. Water may be treated in one of the PORTS groundwater treatment facilities.	Waste may not require sampling and analysis for proper characterization. If contaminated water generated by an emergency response could be treated in the one of the PORTS groundwater treatment facilities, this option should be allowed.	B.1/1
Vol. 1/ Sect. G-4F/ pg. G-17	Revised #4 to state that all impounded runoff will be characterized. Radiological analyses will be performed in accordance with laboratory analytical methods/standard operating procedures.	Waste may not require sampling and analysis for proper characterization. If samples required analysis by an outside laboratory, PORTS lab methods would not be used. Standard laboratory methods (e.g., SW-846) do not exist for most radiological analyses.	B.1/1
Vol. 1/ Sect. G-5/ pg. G-18	Updated description of fire extinguishing equipment.	Informational change.	B.1/1
Vol. 1/ Sect. G-5/ pg. G-19	Clarified the use of 911 to report an emergency in subsection entitled "Internal Communications and Alarm Systems."	Informational change.	B.1/1
Vol. 1/ Sect. G-5/ pg. G-20	Updated section entitled "First Aid and Medical Equipment."	Informational change.	B.1/1
Vol. 1/ Sect. G-5/ pg. G-20	Updated section entitled "Decontamination Equipment" to state that decontamination solutions will be characterized and properly treated or disposed.	Solutions may not require sampling and analysis for proper treatment/disposal.	B.1/1
Vol. 1/ Sect. G-6/ pgs. G-20 & 21	Updated organizations listed under mutual aid/letters of agreement (LOA), location of Joint Public Information Center, and Emergency Plan information.	Informational change.	B.1/1
Vol. 1/ Sect. G-8/ pg. G-25	Removed first two sentences in section.	Informational change.	B.1/1
Vol. 1/ Table G-1/ pg. G-26	Updated emergency coordinators.	Informational change.	C.6.d/1
Vol. 1/ Fig. G-1/ pg. G-29	Updated Fig. G-1, Emergency Response Facilities.	Informational change.	B.1/1
Vol. 1/ Fig. G-2/ pg. G-31	Updated Fig. G-2, PORTS Emergency Planning Map.	Informational change.	B.1/1

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Volume/ Section/ Page ^a	Modification	Justification	OAC/ Class ^b
Vol. 1/ Fig. G-3/ pgs. G-33 & 34	Updated Fig. G-3, Emergency Notification and Release Form.	Informational change.	B.1/1
Vol. 1/ Sect. G, Attachment 1/ pg. G-41	Updated Attachment 1, Emergency Agreements/Arrangements.	Informational change.	B.1/1
Volume 4, Appendix I-1 & I-2			
Vol. 4/ Ap. I-1/ pg. 1-1	Removed sentence that stated "Heat is provided by recirculating heating water and cooled by chilled water systems."	The paragraph already states that the entire building is climate controlled. No further information is needed. Heating and cooling will not continue to be provided by this specific system.	B.1/1
Vol. 4/ Ap. I-1/ pg. 1-6	Removed sentences discussing the X-7725 heating system.	This information is provided previously in this section.	B.1/1
Vol. 4/ Ap. I-2/ pg. 1-5	Removed sentence that states heat for the X-326 building is generated by the diffusion process. Replaced with sentence that states heating and cooling is provided as needed in the RCRA-permitted areas.	Heat for the X-326 building may not continue to be generated by the diffusion process.	B.1/1

^aVolume, section, and page refer to the RCRA Part B Permit Renewal Application (DOE/OR-11-3037&D0 V1-4) dated February 21, 2000 (selected pages updated July 11, 2000).

^bOAC and class (classification) refer to the OAC Appendix reference (OAC 3745-50-51) for the classification of the permit modification.